BFI Sunshine Canyon City/County Landfill

State Clearinghouse Numbers 89071210, 92041053, 1989071210 and 1992041053

FINDINGS OF FACT & STATEMENT OF OVERRIDING CONSIDERATIONS

Los Angeles County Project No. 00-194

November 2006

Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

FINDINGS OF FACT
AND
STATEMENT OF OVERRIDING CONSIDERATIONS

BFI Sunshine Canyon City/County Landfill

Los Angeles County Project 00-194

FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)
State Clearinghouse Number 1989071210

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (SEIR)
State Clearinghouse Number 1992041053

ADDENDUM TO FEIR AND SEIR
State Clearinghouse Number 1989071210

COUNTY OF LOS ANGELES
Department of Regional Planning
Impact Analysis Section
320 West Temple Street, 13th Floor
Los Angeles, California 90012-3225

November 2006

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1.0 INTRODUCTION

1.1 Findings of Fact

The Guidelines for the Implementation of the California Environmental Quality Act (State CEQA Guidelines), codified in the California Code of Regulations (CCR), promulgated pursuant to the CEQA (as amended), provide that "[n]o public agency shall approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant environmental effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more written findings for each of those significant effects" (State CEQA Guidelines, § 15091). As identified in the State CEQA Guidelines, possible findings include the following:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;

2. Changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; and

3. Specific economic, legal, social, technological, or other considerations make infeasible the identified mitigation measures or alternatives.

With respect to those significant effects that are subject to the latter finding, the public agency shall further identify specific overriding economic, legal, social, technological, or other benefits of the pending project before the agency decision-makers that outweigh the significant effects of that project on the environment. Pursuant to CEQA and the State CEQA Guidelines, required findings shall be supported by substantial evidence in the administrative record.

This *Findings of Fact and Statement of Overriding Considerations Regarding the Final Environmental Impact Report (FEIR), Final Subsequent Environmental Impact Report (SEIR), and Addendum to the FEIR and SEIR for the Sunshine Canyon City/County Landfill,* State Clearinghouse Numbers 1989071210 and 1992041053 (Findings and Statement of Overriding Considerations), were prepared by the County of Los Angeles (County) acting in its capacity as a Lead Agency. The Findings and Statement of Overriding Considerations set forth the environmental basis for current discretionary actions by the County and future discretionary actions that may be undertaken by Responsible Agencies for the implementation of the proposed Sunshine Canyon Landfill Project (herein the City/County Landfill or the Project).

1.2 Document Format

This document is comprised of the following sections:

- Section 1 presents an introduction to the Findings of Fact and Statement of Overriding Considerations.

- Section 2 provides a summary of the proposed Project, a statement of Project objectives, and an overview of discretionary actions required for the Project.

- Section 3 presents a summary of those activities and events that have preceded the consideration of the Findings of Fact and Statement of Overriding Considerations by the County as part of the environmental review and public participation process.

- Section 4 sets forth findings regarding those environmental impacts that were identified in the FEIR, SEIR, and Addendum to the FEIR/SEIR, which were determined by the County not to be relevant to the proposed Project, or were not determined to manifest at levels deemed to be significant.

- Section 5 sets forth the significant or potentially significant effects of the proposed Project that can be feasibly mitigated to a less than significant level through the imposition of those measures included in the Project's Mitigation Monitoring and Reporting Summary (MMRS).

- Section 6 sets forth findings regarding the significant or potentially significant environmental impacts that will/may result from the construction and/or operation of the proposed Project; the County will determine what can/cannot be feasibly mitigated to a less than significant level.

- Section 7 provides findings regarding those alternatives to the Project that were examined in the FEIR and SEIR, considered by the County Board of Supervisors and the City of Los Angeles (City) Council as part of their respective deliberations in 1993 (County Landfill) and 1999 (City/County Landfill), and not recommended for selection by the County Board of Supervisors for implementation.

- Section 8 contains the findings regarding the MMRS for the proposed Project.

- Section 9 consists of the Statement of Overriding Considerations that presents the County's reasons for finding that specific economic, legal, social, technological, and other considerations associated with the proposed Project outweigh the Project's potential unavoidable significant environmental effects.

The findings cited in each section herein are supported by substantial facts, which are identified in the administrative record of the proposed Project.

1.3 Custodian And Location of Records

The environmental documents and other materials that constitute the administrative record for the County's actions upon the proposed Project are maintained and located at the following address:

County of Los Angeles
Department of Regional Planning
Impact Analysis Section
320 West Temple Street, 13th Floor
Los Angeles, CA 90012-3225

This department is the official custodian of the administrative record for the proposed Project.

2.0 PROJECT SUMMARY

The following information provides an overview of the Project's location, operations, and discretionary actions required for Project implementation, and a statement of specific Project objectives.

2.1 Project Location

The Project site is located within the northwestern portion of the Los Angeles region and within the corporate jurisdiction of both the City of Los Angeles and County of Los Angeles ([County] Fractional Sections 23 and 24, Township 3 North, Range 16 West, San Bernardino Base Meridian in the County). The Project site is further defined within the Northwest Valley Subregional planning area of the City, and it is included within the City's Granada Hills-Knollwood Community Plan Area (CPA) and the County's Santa Clarita Valley Areawide General Plan.

The Project site address is 14747 San Fernando Road, Sylmar, California. Generally, the Project site is surrounded by unincorporated areas of the County to the north and west and the communities of Granada Hills and Sylmar to the south and east, respectively. It is approximately ¾ mile southwest of the intersection of the Golden State Freeway (I-5) and Antelope Valley Freeway (SR-14) multilevel freeway interchange. The entrance to the Project site is situated ¾ mile northwest of the intersection of Balboa Boulevard and San Fernando Road in the City.

The irregularly shaped Project site consists of ±494 acres in the City and ±542 acres in the County. The entire Project site consists of ± 1,036 acres in Sunshine Canyon.

2.2 Project Background

Sunshine Canyon is owned and operated by Browning-Ferris Industries of California, Inc. (BFI or the Project Proponent), a wholly owned subsidiary of Allied Waste Industries, Inc. At the time of preparation of this document, Sunshine Canyon Landfill consisted of an existing operating County Landfill and an existing operating City Landfill, separated by a 42-acre "bridge" area. The City and County portions of the landfill have developed separately.

Landfill operations formally commenced in the City portion of Sunshine Canyon in 1958. In 1966, the City approved a 25-year variance expanding the landfill within 300 acres on the City side of the property. In 1978, BFI purchased the Sunshine Canyon Landfill property. The City variance expired in September 1991, and landfilling operations ceased on the City portion of the landfill at that time.

2.2.1 The 1993 County CUP and FEIR

In the mid-1980s, while the original City Landfill was operating, BFI began planning to extend landfill operations into the adjoining County portion of Sunshine Canyon. In 1986, BFI applied for Conditional Use Permit 86-312-(5) and other related entitlements (i.e. Compound Plan Amendment, Sub-Plan Amendment and Oak Tree Permit), and the County began preparation of an environmental impact report (EIR). In February 1991, the County Board of Supervisors certified the EIR as a Final EIR (FEIR), granted several land use approvals, including a conditional use permit (CUP), and issued requisite project permits, authorizing the disposal of an average of 6,000 tons of refuse per day (exclusive of inert/exempt materials), six days per week (with a 6,600-ton daily maximum), for a total of approximately 17 million tons of landfill capacity on the County side of the landfill (County Landfill). The County Landfill footprint was approximately 215 acres. Disposal was permitted on multiple working face areas (i.e. the area where waste is being deposited), which were limited to 2 to 3 acres each.

The 1991 County Landfill CUP, related entitlements and Final EIR were challenged in court by both the City and the North Valley Coalition (NVC), a group of residents located south of the landfill. In 1992, the court required preparation of additional CEQA documentation. Two Addenda to the 1991 FEIR and a document entitled *Additional Information and Analysis* were prepared. In November 1993, the County recertified the FEIR as supplemented by these documents,[1] and the County Landfill CUP (the 1993 CUP) was granted final approval. The recertified FEIR was also challenged in court by the NVC, but this challenge was unsuccessful, and the FEIR was upheld.

In the 1993 CUP, while approving the 17-million-ton County Landfill Project within the County, the Board of Supervisors also reaffirmed its 1991 CUP Condition 10b requirement that BFI pursue City approvals for a joint City/County landfill design that would extend the landfill operation southeasterly from the County portion of Sunshine Canyon back across the City/County jurisdictional boundary, into the City area, including much of the inactive City Landfill. At that time, it was estimated that this design would increase the combined capacity of the City and County portions of Sunshine Canyon to 100 million tons without appreciably expanding the total footprint of the separate operations in the City and County. In the FEIR, the combined City/County operation was analyzed, with an indication that complementary entitlements from the City would be required.

In the event these City entitlements were obtained, the 1993 County CUP approved approximately 18 million tons of additional capacity within the County, through the development of a 42-acre "bridge" area on the County portion adjacent to the City/County boundary.

2.2.2 The 1999 City Entitlements and SEIR

In 1991, while litigation was underway in connection with the originally certified County FEIR, BFI filed applications with the City for the entitlements necessary to develop the City portion of a joint City/County landfill, including a General Plan Amendment and Zone Change. Although the FEIR had already analyzed a combined City/County landfill design, that earlier design was somewhat larger than that contemplated in BFI's applications to the City; and the City requested certain other refinements in the design and operation of the proposed Project that were not contemplated in the FEIR. Thus, the City determined that a subsequent EIR (SEIR) would be required under CEQA to more specifically address these changes.[2]

As a result of the litigation noted above, there was substantial delay in processing City approvals. In July 1997, the Draft Subsequent Environmental Impact Report (Draft SEIR)[3], which incorporated by reference the FEIR, was issued. The Final Subsequent Environmental Impact Report (Final SEIR), incorporating the Draft SEIR and responding to several hundred individual comments, was issued in June 1998. After nine public hearings before various City planning bodies and the City Council, the City certified the SEIR for the combined City/County Landfill (the proposed Project) and issued the City entitlements necessary to carry out the proposed Project on December 8, 1999.

As described in the SEIR and approved by the City, the combined City/County Landfill will accommodate a

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1/ *Final Environmental Impact Report, Sunshine Canyon Landfill Extension*, State Clearinghouse Number 1989071210 (November 1993).

2/ The City's Environmental Study Advisory Committee (ESAC) determined in 1991 that the following environmental topical areas should be fully addressed in the SEIR: earth, air quality, biological, noise, land use, risk of upset, transportation/circulation/access, public services, energy conservation, water conservation, service systems, equestrian issues and cultural resources.

3/ *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill*, State Clearinghouse Number 1992041053 (July 1997).

total disposal capacity of approximately 90 million tons, consisting of 55 million tons in the City and 35 million tons in the County.[4] The County portion of the proposed Project includes the 17-million-ton County Landfill (currently in operation), and the 18-million-ton increment in the 42-acre bridge area; both of which were authorized by the 1993 County CUP.

The proposed Project authorizes disposal in both the City and County of an average of 11,000 tons per day, six days per week, of Class III solid waste (with a 12,100 ton daily maximum), and 6,600 tons per week of inert/exempt materials. The landfill footprint encompasses approximately 451 acres: 194 acres in the City (including part of the inactive City Landfill) and 257 acres in the County (including the 215-acre footprint of the operational County Landfill and the 42-acre bridge area). The proposed Project also provides for a maximum 10-acre working face area (i.e. the area where waste is being deposited).

In January 2000, the NVC filed a lawsuit attacking the proposed Project approvals rendered by the City, including the City's certification of the SEIR. The NVC alleged numerous deficiencies in the SEIR and alleged that the proposed Project was inconsistent with the City's General Plan and zoning. In December 2000, the Los Angeles Superior Court upheld the proposed Project approvals in all respects, and that decision was upheld by the California Court of Appeal. The decision of the Court of Appeal was not appealed to the State Supreme Court and is therefore final. Accordingly, the 1999 City approvals remain in full force and effect.

Between 2000 and 2005, operational approvals and permits were systematically obtained to commence landfilling on the City side of the property:

- Solid Waste Facilities Permit from the California Integrated Waste Management Board (CIWMB)
- Waste Discharge Requirements and 401 Certification from the Los Angeles Regional Water Quality Control Board (RWQCB)
- 404 Permit from the U.S. Army Corps of Engineers
- 1603 Agreement from the California Department of Fish and Game (CDFG)
- 1150.1 Permit from the South Coast Air Quality Management District (SCAQMD)
- Oak Tree Permit from City.

Additionally, the City required approvals for transportation system improvements, clearance by a Technical Advisory Committee (the City TAC), a final Mitigation Reporting and Monitoring Program (MRMP), and the hiring of independent City monitors to review air quality reports and insure compliance with all conditions of approval and the MRMP. Following acquisition of these approvals and permits, final clearance by the City TAC, and construction, the City side of Sunshine Canyon Landfill began operations in July 2005.

2.3 Current Application for CUP 00-194

2.3.1 Proposed County CUP 00-194 and Addendum

Under CEQA, an addendum to an EIR may be prepared when "some changes or additions are necessary," and the standard for preparation of a supplemental or subsequent EIR has not been met (CEQA Guidelines sections 15162, 15163, 15164). The County determined that approval of CUP 00-194 does not meet the standard for preparation of a supplemental or subsequent EIR because there is no substantial change to the proposed Project described in the FEIR and SEIR, and there has been no substantial change in circumstances or new information sufficient to warrant that level of review. Therefore, to address the proposed revisions to the County CUP 86-312-(5), as embodied in CUP 00-194, the County prepared a CEQA addendum (the

4/ See City [Q] Conditions B.2.a and B.2.b.

Addendum) to the previously certified FEIR and SEIR. The Addendum also addresses revisions to the Mitigation Monitoring and Reporting Summary (the MMRS) approved in 1993 for the County Landfill.

Although it is not required under CEQA, the County decided to follow a public participation process before certifying the Addendum. Therefore, the Addendum was filed with the State Clearinghouse, circulated to public agencies and other interested parties (including the primary opponents of the Project), and made available at seven City and County public libraries, including local libraries in Granada Hills and Sylmar. Comments on the Addendum were received during a 45-day circulation period that started on October 18, 2004, and ended on December 1, 2004.

On December 1, 2004, the end of the circulation period, the County Regional Planning Commission held a public hearing to consider the proposed modifications to the previously approved CUP. In addition to presentations by County staff, representatives of the City, and the Project Proponent, public testimony was given to the commission. The hearing was resumed on January 12, 2005 at Granada Hills High School in Granada Hills, CA, where extensive public comment was provided. Additional public hearings followed on April 6, 2005; August 10, 2005; and November 3, 2005. On December 21, 2005, the Los Angeles County Regional Planning Commission denied proposed CUP 00-194. Following the denial, the Project applicant filed an appeal of the Regional Planning Commission's decision with certain revisions. At a June 7, 2006 hearing on that appeal, the County Board of Supervisors approved a proposed CUP 00-194.

2.3.2 County CUP 00-194

County CUP 00-194, which replaces 1993 County CUP 86-312-(5), authorizes development of a combined City/County landfill, as described in Condition 10b of the 1993 CUP, and ensures conformance between the County's 1993 CUP and the City's 1999 approvals. The proposed revisions to the 1993 County CUP consist of the deletion, modification, and renumbering of certain conditions, as well as the addition of conditions.

2.4 Primary Purpose and Objectives of CUP 00-194

CUP 00-194 authorizes development of a combined City/County landfill, which will:

- Connect City and County landfill operations, thus providing combined landfilling operations at a single landfill footprint in either jurisdiction;
- Provide cost-effective, short-, mid-, and long-term solid waste disposal capacity at the Project site for residences and businesses within the Los Angeles region.
- Provide efficient solid waste management and disposal capacity to both the City and County by developing a landfill facility to avert an identified short-term and potential future long-term solid waste disposal capacity shortfall;
- Provide both City and County jurisdictions the opportunity for long-term solid waste disposal capacity;
- Minimize impacts on air quality within the South Coast Air Basin (SCAB) by providing additional disposal capacity within the Los Angeles region, thereby reducing emissions from transporting refuse longer distances; and
- Minimize significant impacts on environmental resources associated with the development of new landfill sites (i.e. proposed sites located within undisturbed canyon areas or remote desert locations)

by using areas within Sunshine Canyon that are primarily disturbed, and have infrastructure in place to accommodate future development.

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3.0 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION PROCESS

3.1 Prior Environmental Review and Public Participation

Beginning in 1988 with the public review process for the County's Draft EIR, actions have been undertaken by the County, City, and other public agencies to facilitate public participation during the environmental review of projects at Sunshine Canyon Landfill. **Table 3-1** (Sunshine Canyon Landfill Public Hearings and Meetings) lists the public hearings and meeting that were conducted prior to the above-noted County hearing process for CUP 00-194.

Table 3-1
Sunshine Canyon Landfill Public Hearings and Meetings

Date	Event
1/5/88	Public Scoping Meeting re: Draft Environmental Impact Report ("EIR") for extension of Sunshine Canyon Landfill into Los Angeles County area ("County Landfill")
3/6/89	LA County Significant Ecological Area Technical Advisory Committee ("SEATAC") meeting
10/4/89	LA County Regional Planning Commission hearing re: Draft EIR for County Landfill
11/2/89	LA County Regional Planning Commission hearing re: Draft EIR
1/17/90	LA County Regional Planning Commission hearing re: Draft EIR
2/22/90	LA County Regional Planning Commission hearing re: Draft EIR
7/25/90	LA County Regional Planning Commission hearing re: Conditional Use Permit ("CUP"), Oak Tree Permit and Plan Amendments for County Landfill (collectively, "County Entitlements") and related Draft EIR
9/27/90	LA County Regional Planning Commission hearing re: County Entitlements and Draft EIR
11/29/90	LA County Board of Supervisors hearing re: County Entitlements and Final EIR
1/29/91	LA County Board of Supervisors hearing re: County Entitlements and Final EIR
2/14/91	LA County Board of Supervisors hearing re: County Entitlements and Final EIR
2/19/91	LA County Board of Supervisors hearing for approval of County Entitlements and certification of Final EIR
4/29/92	LA County Public Scoping Meeting re: revisions to Final EIR
5/4/92	LA County SEATAC meeting re: County Landfill
5/18/92	LA County SEATAC meeting re: County Landfill and proposal for revised Final EIR
6/1/92	LA County SEATAC meeting re: County Landfill
6/4/92	LA County Public Scoping Meeting re: revised Final EIR
7/28/92	LA County Board of Supervisors hearing re: Addendum to Final EIR

Table 3-1, cont.
Sunshine Canyon Landfill Public Hearings and Meetings

Date	Event
7/14/93	LA County Regional Planning Commission hearing re: additional Responses to Comments for Final EIR
7/28/93	LA County Regional Planning Commission hearing for consideration of final County Entitlements and Final EIR
8/4/93	LA County Regional Planning Commission hearing re: approval of County Entitlements and certification of Final EIR
10/21/93	LA County Board of Supervisors hearing re: County Entitlements and Final EIR
11/18/93	LA County Board of Supervisors hearing re: County Entitlements and Final EIR
11/30/93	LA County Board of Supervisors hearing for approval of County Entitlements and certification of Final EIR
9/8/94	City of Los Angeles Board of Zoning Appeals hearing re: County Landfill access road
11/8/94	City of LA Board of Zoning Appeals hearing re: County Landfill access road
11/21/94	City of LA Zoning Administrator Public Hearing re: County Landfill access road
12/8/94	City of LA Planning Commission hearing re: revisions to the Granada Hills – Knollwood Community Plan
1/11/95	LA County Regional Planning Commission hearing re: deletion of City Use Restriction from 1993 County Landfill CUP
2/1/95	LA County Regional Planning Commission hearing for approval of revision to County Landfill CUP
2/28/95	City of LA Board of Zoning Appeals hearing re: County Landfill access road
5/5/95	LA County Board of Supervisors hearing re: deletion of City Use Restriction from County Landfill CUP
6/8/95	LA County Board of Supervisors hearing re: County Landfill access road
6/20/95	LA County Board of Supervisors hearing re: dedication of property relative to access road issues
10/5/95	LA County Board of Supervisors hearing re: deletion of City Use Restriction from County Landfill CUP and access road issues
12/7/95	LA County Board of Supervisors hearing re: County Landfill CUP and access road issues
1/11/96	LA County Board of Supervisors hearing re: revised County Landfill CUP
5/14/96	City of LA Building and Safety Commission hearing re: County Landfill haul route application
6/5/96	LA County Sunshine Canyon Landfill Extension Compliance Committee meeting re: commencement of County Landfill activities

Table 3-1, cont.
Sunshine Canyon Landfill Public Hearings and Meetings

Date	Event
11/18/97	City of LA Key Group Meeting re: proposed General Plan Amendment to allow the extension of landfilling back into the City for establishment of a City/County Landfill
10/29/98	City of LA Planning Commission hearing re: General Plan Amendment and Zone Change (collectively, "City Entitlements") and Draft Subsequent EIR for the City/County Landfill
2/25/99	City of LA Planning Commission hearing re: City Entitlements and Draft SEIR
8/10/99	City of LA Planning and Land Use Management Committee hearing re: City Entitlements and Draft SEIR
8/17/99	City of LA Planning and Land Use Management Committee hearing re: City Entitlements and Draft SEIR
9/22/99	LA City Council hearing re: City Entitlements for City/County Landfill (including City-only Landfill) and Final SEIR
9/28/99	LA City Council hearing re: City Entitlements and Final SEIR
10/26/99	LA City Council hearing re: City Entitlements and Final SEIR
10/28/99	City of LA Environmental Quality and Waste Management/Budget and Finance Joint Committee hearing re: City Entitlements and Final SEIR
11/2/99	LA City Council hearing re: City Entitlements and Final SEIR
11/9/99	LA City Council hearing re: City Entitlements and Final SEIR
11/17/99	LA City Council hearing re: City Entitlements and Final SEIR
12/8/99	LA City Council hearing re: City Entitlements and Final SEIR
1/5/01	LA City Technical Advisory Committee meeting re: status of Landfill permitting activities
12/14/01	LA City Technical Advisory Committee meeting re: status of Landfill permitting activities
5/5/03	California Integrated Solid Waster Board re: Solid Waste Facilities Permit.
5/13/03	California Integrated Solid Waster Board re: Solid Waste Facilities Permit.
7/24/03	L.A. Regional Water Quality Control Board re: Waste Discharge Requirements
9/11/03	L.A. Regional Water Quality Control Board re: Waste Discharge Requirements
11/6/03	L.A. Regional Water Quality Control Board re: Waste Discharge Requirements
12/4/03	L.A. Regional Water Quality Control Board re: Waste Discharge Requirements
1/29/04	L.A. Regional Water Quality Control Board re: 401 Certification

Comments submitted in testimony or in comment letters as part of this related public review process were addressed in a series of response to comments documents:

- *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Pre-Circulation Comments from County Agencies*, Volume III, State Clearinghouse Number 1984082908, July 1989.
- *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Comments*, Volume A, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1984082908, July 1990.
- *Draft Environmental Impact Report, Sunshine Canyon Landfill Extension, Responses to Comments (Original Comments Received)*, Volume B, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1984082908, July 1990.
- *Final Environmental Impact Report, Sunshine Canyon Landfill Extension, Comments Received and Responses for the Los Angeles County Board of Supervisors*, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1989071210, February 1991.
- *Addendum to Final Environmental Impact Report, Sunshine Canyon Landfill Extension, Comments Received and Responses for the Los Angeles County Board of Supervisors*, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1989071210, February 1991.
- *Responses to Comments on the Additional Information* and *Analysis Regarding the Environmental Impact Report for the Sunshine Canyon Landfill Extension* and *Appendices*, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1989071210, June 1993.
- *Responses to Comments Received during the Los Angeles County Regional Planning Commission Public Hearing for the Sunshine Canyon Landfill Extension*, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1989071210, July 1993.
- *Responses to Comments on the Sunshine Canyon Landfill Extension for the County of Los Angeles Board of Supervisors*, County of Los Angeles, Department of Regional Planning, State Clearinghouse Number 1989071210, November 1993.

3.2 Initial Study for Proposed CUP 00-194

The County Department of Regional Planning prepared an Initial Study, dated March 2004, to evaluate the potential impacts from approval of proposed CUP 00-914. The Department of Regional Planning found that on the basis of the Initial Study, adoption of the proposed CUP 00-194 would result in no new significant environmental effects and no substantial increase in the severity of effects as identified in the FEIR and SEIR. Therefore, the FEIR and SEIR would be considered adequate with the completion of an Addendum.

The Initial Study was distributed to the following reviewing agencies:

- Los Angeles RWQCB
- California Department of Health Services
- Army Corps of Engineers
- CIWMB

- California Department of Fish and Game
- Santa Monica Mountains Conservancy
- California Air Resources Board
- SCAQMD
- CalTrans
- City of Los Angeles
- County Department of Public Works, Traffic & Lighting
- County Health Services, Environmental Protection and Solid Waste Management Programs
- County Department of Parks and Recreation
- County Fire Department

3.3 Addendum for Proposed CUP 00-194

As stated in CEQA Guideline Section 15164(c), "An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration." Nonetheless, as noted previously in Section 2.3.1, the County elected to incorporate a public participation process before certifying the Addendum.

The public was allowed to provide comments on the Addendum at the five separate Regional Planning Commission public hearings previously noted, and comments submitted at those hearings or in comment letters were responded to in two documents:

- *BFI Sunshine Canyon City/County Landfill, Addendum to FEIR/SEIR, Response to Comments*, Los Angeles County Department of Regional Planning, March 2005.

- *BFI Sunshine Canyon City/County Landfill, Conditional Use Permit 00-194, Response to CUP Comments*, Los Angeles County Department of Regional Planning, April 2006.

Additional comments on the Addendum and CUP 00-194 were submitted as testimony at the Board of Supervisors' hearing on June 7, 2006, or as written comment letters submitted at or prior to that hearing. Responses to the testimony and written comments are provided in:

- *BFI Sunshine Canyon City/County Landfill, Conditional Use Permit 00-194, Response to Comments from County Board of Supervisors Hearing*, Los Angeles County Department of Regional Planning, November 2006.

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4.0 ENVIRONMENTAL EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION MEASURES

The following listing of environmental effects follows the order of topical issues set forth in the County's 2004 Initial Study and Addendum to the FEIR and SEIR.

Based on the information developed in the preparation of the FEIR, SEIR, Addendum, and the whole of the record in this matter, the County finds that the following potential environmental effects of the Project are less than significant without the imposition of mitigation measures:

4.1 Noise (Construction Noise Impacts)

Construction noise impacts are discussed in Section 3.2.9 (Noise) of the FEIR, Section 4.5.1 (Construction Noise Impacts) of the Draft SEIR, and Section 3.1.4 (Noise) of the Addendum.

Although construction noise levels (predominantly created by heavy equipment) would result in a short-term increase to existing ambient noise levels, the increase is expected to be imperceptible to noise receptors given that the closest receptor is located 1,700 feet southwest of the nearest point of the construction area on-site; the intervening ridge surrounding the landfill serves as a natural attenuation feature, and there is a limited quantity of equipment that would operate at any given time.

Noise levels would also increase as a result of traffic generated by construction worker commute trips. The main point of potential impact would be at the entrance of the landfill since all of the construction workers would use this as an access roadway; certain receptors are located directly across the street, along San Fernando Road. It is anticipated that the addition of construction worker vehicle trips would add less than 0.2 dBA to the peak-hour traffic noise (and far less to the CNEL). This impact would not be considered audible, nor would it cause a significant noise impact to sensitive receptors in the immediate area. The total Project contribution to the PM peak hour traffic noise level would be considered even less since the existing PM peak hour traffic volumes are greater than AM peak-hour volumes. Therefore, construction traffic-generated noise impacts would be less than significant.

Adoption of CUP 00-194 would not generate additional noise impacts. The CUP 00-194 would adjust the limitations on waste intake on the County side to be consistent with combined City/County operations authorized in the 1999 City approvals; revise conditions in the 1993 County CUP to be consistent with measures imposed by the City, and not increase the maximum weekly and daily tonnage intakes beyond what was previously analyzed for a combined City/County landfill.[1] CUP 00-194 would not generate additional construction noise impacts beyond those analyzed in the FEIR and SEIR; thus, the Addendum found that with adoption of CUP 00-194, construction noise impacts would remain at less than significant levels.

4.2 Health Risk Analysis (subsection of Air Quality and Water Quality)

Health risks are addressed in Section 3.2.6 (Air Quality) of the FEIR, Section 4.2.9 (Health Risk Analysis) of the Draft SEIR, and Sections 3.2.1 (Water Quality) and 3.2.2 (Air Quality) of the Addendum.

Combustion of landfill gas (LFG) can potentially release criteria pollutants and toxic air contaminants (TACs) in the atmosphere, which may in turn evoke health hazards. In order to determine the potential for such an impact, qualified air quality consultants performed health risk analyses as part of the preparation of the SEIR. The first analysis used the EPA SCREEN2 dispersion model to calculate several potential impacts: (1)

[1] / *Draft SEIR,* Section 2.5, p. 2-26, and Section 2.6, p. 2-44 (1997).

impact from the fraction of TACs not destroyed in the LFG combustion process, (2) impact from the byproducts of the combustion process, and (3) impact from criteria pollutants. The analysis is included in the SEIR, Appendix B6, "Low-Level Health Risk Assessment." Even when conservative (over-predictive) assumptions are used, the analysis found that the emissions of TACs and TAC by-products resulted in health risks that are less-than-significant. Specifically, the analysis calculated (i) an individual cancer risk of 0.0182 in a million, compared to the SCAQMD significance threshold of one in a million, (ii) a chronic health risk of 0.0000409 using the hazard index,[2] compared to a significance threshold of 0.5, and (iii) and acute health risk of 0.0000292 using the hazard index, compared to a significance threshold of 0.5. In addition, the analysis determined that all criteria pollutants were below the de minimis thresholds established by SCAQMD Rule 1303. Thus, combustion of LFG, both in terms of TACs and criteria air pollutants, would not result in a significant impact to air quality.

Based upon the comments received following the circulation of the Draft SEIR, air quality consultants performed a second health risk analysis. The second analysis is included in the Final SEIR, Appendix D3, "Revisions to Draft SEIR, Appendix B6, Low-Level Health Risk Assessment." Instead of the SCREEN2 model, the second analysis used the ISCST3 model, as well as updated LFG production rates and composition data. The second analysis verified that toxic emissions resulting from the combustion of LFG are below the SCAQMD regulatory thresholds of significance.

In response to concerns raised by the community, air quality monitoring was performed to evaluate whether LFG was detectable at Van Gogh Elementary School. The study was performed by Environ, and the monitoring methodology and the results of the monitoring study were reviewed by Clark, Sief, Clark, a consulting firm hired by the City. The analysis involved the collection of air samples from the landfill and from Van Gogh Elementary School, which is located at 17160 Van Gogh Street in Granada Hills (approximately 1¾ miles from the landfill entrance, and more than one mile from the nearest point of the landfill). Air samples were collected on four separate occasions during the late spring and early summer of 2003, when the potential for release of LFG is at its highest. The air samples were analyzed for vinyl chloride, dichlorobenzene, and methane, all of which are compounds indicative of LFG. Vinyl chloride and dichlorobenzene were not detected in any of the air samples, and the concentration of methane was consistent with normal background concentrations in ambient air. Thus, the monitoring demonstrates that LFG is not impacting air quality at Van Gogh Elementary School.

Furthermore, in compliance with a condition imposed by the City in its approval of the City landfill expansion, baseline air monitoring for particulates (dust) and diesel exhaust emissions was conducted in the community for over one year. The study was performed by Environ, and the monitoring methodology and the results of the monitoring study were reviewed by Clark, Sief, Clark. The study compared monitoring data from the perimeter of the landfill to data collected at the Van Gogh Elementary School, and it concluded that air quality at both sites was heavily impacted from the adjacent freeways. Moreover, the study found that on the days with the highest dust (or diesel exhaust) concentrations at the school, the prevailing winds blew towards the school from the freeway, rather than from the landfill to the school. The study also found that particulate levels in the community were consistent with monitoring data from residential communities monitored by the SCAQMD.

Additionally, at the request of the County, the City, and the Los Angeles RWQCB, medical experts have conducted several reviews of reported human health data for the surrounding community. As early as 1988, a study of the residential area south of the landfill led the City Zoning Administrator to conclude: "Allegations

[2]/ The "Hazard Index" is the ratio of the ambient level of an air emission to the level identified as the "Non-Cancer Reference Exposure Level" by the Toxics Committee of the California Air Pollution Control Officers Association (CAPCOA).

of health impacts, allergies, skin conditions, respiratory conditions, etc. are unproven;"[3] and in 1989, the City's Board of Zoning Appeals upheld this finding.[4]

In 1993, Dr. Paul Papanek, former Chief of the Toxics Epidemiology Program for the Los Angeles County Department of Health Services, determined that the potential health risks related to landfill exposure were too low to warrant an epidemiological study,[5] and Dr. Thomas Mack, Professor of Preventive Medicine at the University of Southern California School of Medicine, shared Dr. Papanek's opinion that it would not be valuable to conduct an epidemiological study in the community neighboring the landfill.[6]

In 1999, Dr. Wendy Cozen, Assistant Professor of Preventive Medicine for the University of Southern California, stated that she did not find excess risk of cancer in the community from the landfill activities.[7] Four years later, based on an updated study, Dr. Cozen stated in a September 4, 2003 report to the Los Angeles RWQCB, "There is no evidence of excess cancer risk among residents living near the Sunshine Canyon landfill over and above that of other Los Angeles County residents."[8] In a follow-up report dated October 18, 2003, Dr. Cozen studied cancer occurrence in the census tract (including the Sunshine Canyon landfill) and its adjacent tract. The study evaluated all cancers together, and then bladder, liver, and colon cancers separately, since these are most likely a manifestation of a carcinogenic exposure in air or water. In testimony at the Los Angeles RWQCB meeting on November 6, 2003, Dr. Cozen stated, "We did not find excess cancer occurrence detected in the residents near Sunshine Canyon."[9]

Furthermore, testimony at the September 11, 2003 Los Angeles RWQCB meeting indicated that there has been no evidence that the communities in the vicinity of the proposed Project have been exposed to air contaminants. Dennis Dickerson, who was at that time the Executive Officer of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB), testified at the meeting, "For the landfill or for any other substance to cause adverse health impacts, there must be pathways to carry pollutants from the site to the human population. In the case of the proposed landfill expansion, potential pathways may include ground and surface water and airborne emissions."[10]

Similarly, Dr. James Stratton, medical epidemiologist for the Office of Environmental Health Hazard Assessment of the California Environmental Protection Agency, testified at the meeting, "there does not appear to be an air pathway of exposure at the present time from operation" [of the Sunshine Canyon landfill].[11] Dr. Stratton also stated that Larry Israel, a SCAQMD Inspector who had been following the landfill site for 13 years, had indicated that there had not been any evidence of off-site toxic air contaminants during that time.[12] These findings support the conclusion that airborne emissions from the Sunshine Canyon Landfill do not present a significant health risk to residents in the surrounding community.

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[3]/ *Decision of Zoning Administrator, Case No. ZA 17804 (RV), Consideration of Revocation – Zone Variance,* City of Los Angeles, Department of City Planning (September 1, 1988).
[4]/ *Decision of City Council, CF 89-0805,* City of Los Angeles (July 21, 1989).
[5]/ *Letter to Susan Bok at the City of Los Angeles, Department of City Planning,* Dr. Paul J. Papanek, County of Los Angeles, Department of Health Services, Toxics Epidemiology Program (February 22, 1993).
[6]/ Ibid.
[7]/ *Letter to Paul Hurt at UltraSystems Environmental,* Dr. Wendy Cozen, University of Southern California, Cancer Surveillance Program (April 26, 1999).
[8]/ *Community Cancer Assessment for the Sunshine Canyon Landfill area, Los Angeles County, California,* Dr. Wendy Cozen, University of Southern California, Keck School of Medicine (September 4, 2003).
[9]/ Reporter's Transcript of Proceedings, Los Angeles Regional Water Quality Control Board, Regular Board Meeting, p. 209 (November 6, 2003).
[10]/ *Reporter's Transcript of Proceedings,* Los Angeles Regional Water Quality Control Board, Regular Board Meeting, p.35 (September 11, 2003).
[11]/ Ibid., p. 59.
[12]/ Ibid., p. 47.

Testimony at the September 11, 2003 Los Angeles RWQCB meeting also addressed the potential for health risks from groundwater contaminants. Dr. Stratton testified, "there is no potential pathway either in the past or currently via water that would suggest a way for members of this community to be exposed" [to pollutants from the landfill].[13] Dr. Stratton further testified, "I have not, despite now more than two months of looking, been able to find any evidence of a direct off-site exposure to the community among any of these various pathways."[14] Dr. Stratton's testimony, and the reviews of reported human health data for the community indicate that there has been no evidence that the communities in the vicinity of the proposed Project have been exposed to groundwater contaminants from the landfill.

As a comprehensive follow-up to all of these studies, the County Department of Health Services conducted a public health survey, consisting of a questionnaire sent to households within the community located closest to Sunshine Canyon Landfill (and in a comparison community in Chatsworth, which is not located near a landfill). The final results of this survey were submitted to the Board of Supervisors as a "Final Report on Community Health Concerns and the Sunshine Canyon Landfill," dated February 22, 2005. The investigation included eight components: (1) an analysis of cancer data by the University of Southern California Cancer Surveillance Program (CSP);[15] (2) analysis of low birth weights;[16] (3) analysis of birth defect data from the California Birth Defects Monitoring Program (CBDMP);[17] (4) analysis of death rates and causes of death;[18] (5) analysis of childhood asthma; (6) a household survey; (7) cancer case verification; and (8) a literature review. With the exception of an increase in self-reported asthma among women, which was not attributed to the landfill, this investigation did not find evidence of unusually high rates or unusual patterns of disease in the concerned community relative to disease rates and patterns seen countywide, again confirming the findings of earlier studies.

Because (i) there is no evidence of an airborne or water-borne pathway for members of the neighboring communities to be exposed to significant levels of toxic pollutants from the landfill, (ii) monitoring in the community has not shown impacts from the landfill on air quality, and (iii) reviews conducted by medical experts have concluded that there is no evidence to support alleged health impacts, it can be concluded pursuant to CEQA Guidelines Section 15384 that there is not substantial evidence of a potential airborne or water-borne health risk that would call for further analysis. Because CUP 00-194 would not generate additional air emissions or water quality impacts beyond those analyzed in the FEIR and SEIR for a combined City/County landfill, adoption of CUP 00-194 would not constitute an additional health risk. Accordingly, the Addendum found that with adoption of CUP 00-194, health risks would remain at less than significant levels.

Note that although both the FEIR and SEIR did not identify any significant health risk from air emissions, a citizen's advisory committee was established through a Project condition to address area resident health concerns about the existing inactive and proposed City/County Landfill Project. The committee's mandate includes discussions with appropriate technical experts and regulatory agencies responsible for the on-site and

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[13]/ Ibid., p.45.
[14]/ Ibid., p. 48.
[15]/ Cozen, W., Assistant Professor of Preventive Medicine. Department of Preventive Medicine, University of Southern California Cancer Surveillance Program. *Community Cancer Assessment on the Sunshine Canyon Landfill Area.* Final Report October 18, 2003.
[16]/ Rangan, C., Director. Toxics Epidemiology Program, Los Angeles County Department of Health Services. *Low Birth Weight Assessment in the Sunshine Canyon Landfill Area.* Final Report November 17, 2003.
[17]/ Harris, J., Chief. California Birth Defects Monitoring Program, California Department of Health Services. *Community Birth Defects Assessment on the Sunshine Canyon Landfill Area.* Final Report October 24, 2003.
[18]/ Rangan, C., Director. Toxics Epidemiology Program, Los Angeles County Department of Health Services. *Mortality Assessment in the Sunshine Canyon Landfill Area.* Final Report November 17, 2003.

off-site monitoring activities at the Project site. The advisory committee is responsible for presenting information and discussions of these regulatory agency members back to area residents through planned informational meetings.

4.3 Cultural Resources (Historical Resources)

Historical resources are discussed in Section 3.2.5 (Archaeological, Historical, and Paleontological Resources) of the FEIR, Section 4.19.3 (Historical Resources) of the SEIR, and Section 3.2.4 (Archaeological/Historical/and Paleontological Resources) of the Addendum.

No historically significant structures exist on the Project site; thus, the proposed Project would not adversely affect a historical resource, physically impact any unique ethnic cultural values, or restrict existing religious or sacred uses. With adoption of CUP 00-194, impacts to historical resources would remain less than significant.

4.4 Mineral Resources

Mineral resources are discussed in Section 3.2.7 (Odor/Landfill Gas) of the FEIR, Section 4.8 (Natural Resources) of the SEIR, and Section 3.2.5 (Mineral Resources) of the Addendum.

The landfill is in a fossil fuel producing area, consisting of the Cascade Oil Field, which includes a portion of the Project site, and the Newhall Oil Field and Aliso Canyon Oil Field, which are located proximate to the Project site. Eight dry, abandoned, and capped oil and gas wells are located within Sunshine Canyon. However, landfill operations would not involve the development of new oil or gas wells, nor would they involve the reuse of existing wells. Therefore, the operation of the proposed Project would not result in the depletion of these natural resources, nor would it involve depletion of active wells. Likewise, no gravel/soil extraction activities have been proposed and, with the exception of excavation for the placement of refuse and obtaining cover material, no excavation of subsurface materials has been proposed (with the exception of excavation for the placement of refuse and obtainment of cover material).

LFG is being produced on-site by the natural decomposition of refuse. The LFG is currently being collected and flared on-site, but it will eventually be converted into energy, thereby reducing the Project's requirement for commercial electrical power and/or reducing the cost of power from a service provider. The Project Proponent has contracted with an outside gas recovery company which is currently evaluating the economic viability and developability of a LFG utilization facility for the sale of energy. Thus, the proposed Project could potentially function as a new source of mineral resources.

Adoption of CUP 00-194 would not initiate development of new oil, gas wells, or the reuse of existing wells; and it would not have an effect on plans for the use of the on-site LFG (for energy). Thus, with adoption of CUP 00-194, impacts related to mineral resources would be less than significant.

4.5 Traffic/Access (Congestion Management Program)

Compliance with the County Congestion Management Program (CMP) is addressed in Section 4.13.2 (Los Angeles County Congestion Management Program) of the SEIR and Section 3.3.1 (Traffic/Access) of the Addendum.

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[19]/ Telephone communication from Jim Aidukas at JTA & Associates to UltraSystems staff, July 2004.

The Congestion Management Program (CMP) is a state-mandated program, which provides a framework for addressing state-wide concerns in regards to highway congestion. In Los Angeles County, the CMP is administered by the Los Angeles County Metropolitan Transportation Authority (LACMTA). The CMP includes a Land Use Analysis Program that sets the warrants and procedures for the transportation impact analysis (TIA) of new development, as well as the trips impacting the adopted CMP highway and arterial network. Per CMP TIA criteria, mainline freeway monitoring stations will require evaluation if the project adds 150 or more trips in either direction (during the AM or PM peak hours).

The SEIR concluded that AM/PM peak-hour Project-generated trips would not rise above the threshold of 150 or more additional trips. Accordingly, the SEIR determined that no CMP TIA analysis was warranted. The Addendum also found that AM and PM peak-hour "freeway-oriented" trips generated by the City portion of the Sunshine Canyon Landfill would be well below the threshold of 150 trips required for the freeway segment analysis. The Addendum considered traffic that would be generated exclusively by the City portion, because the County portion is already operational, and it would not be adding new vehicle trips.

Thus, implementation of CUP 00-194 would not increase traffic levels beyond those analyzed in the FEIR and SEIR. Impacts would remain less than significant.

4.6 Traffic/Access (Construction-Related Traffic)

Construction traffic is specifically discussed in Section 4.13.3 (Construction-Related Traffic) of the SEIR.

Construction-related traffic impacts on adjacent roadway networks would be minimal, short term, and of limited duration. They would therefore not significantly impact transportation and circulation. During construction activities, it is anticipated that on-site personnel would not exceed 70 persons. Based on one person per vehicle, approximately 140 trip ends would be generated daily (i.e. 70 inbound trips and 70 outbound trips). In addition, construction-related vehicles would generate up to 16 trips (8 inbound trips and 8 outbound trips). Adoption of CUP 00-194 would not increase construction vehicle trips beyond what was already analyzed in the SEIR. Impacts would be less than significant.

4.7 Traffic/Access (Internal Project Access)

The SEIR specifically discussed internal access issues in Section 4.13.5 (Access Roadway in Sunshine Canyon).

As part of the implementation of the proposed City/County Landfill Project, the existing access roadway would be used until realignment of the roadway is required to accommodate the development of landfilling areas within the Project site. During this development, the access road would be progressively shortened and realigned toward the mouth of Sunshine Canyon. Realignment would also result in the landfill entrance being relocated approximately 50 feet southward of its present location. The final realignment of the access roadway would parallel the I-5 Freeway. No impacts associated with this internal roadway realignment were identified. Adoption of CUP 00-194 would not affect the planned internal Project access. Impacts would be less than significant.

4.8 Traffic/Access (Alternative Transportation)

Impacts associated with alternative transportation are discussed in Section 4.13.6 (Public Transportation) of the SEIR and Section 3.3.1 (Traffic/Access) of the Addendum.

The proposed City/County Landfill Project would be consistent with the goals and policies detailed in the Regional Mobility Element (RME). Specifically, it would not impact bus lines, nor would it have any impact on rail/light rail service. The proposed Project is not anticipated to impact and/or affect any of the localized bus routes during construction/operation of the landfill facility since no service routes are located on roadways adjacent to the Project site. Furthermore, due to the distance of the Project site from existing rail lines and stations, the development and operation of the proposed Project are not expected to disrupt service; nor should they impact the existing or proposed rail lines within the immediate area. Adoption of CUP 00-194 would not affect alternative transportation. Thus, impacts would be less than significant.

4.9 Sewage Disposal

The FEIR does not discuss sewage disposal. The SEIR briefly discusses sewers in Section 4.16.5 (Sewers), and the Addendum discussed sewage disposal in Section 3.3.2 (Sewage Disposal).

Domestic wastewater is disposed of via a septic leach field system, and the existing septic leach field system is adequate to serve the employees on both the City and County portions of the landfill. The two primary sources of sewer discharge are: (1) the treated liquid condensate from the LFG collection system, and (2) the treated leachate from the leachate collection and removal system. The City of Los Angeles Industrial Waste Management Division (IWMD) regulates discharges from the proposed Project to the sewer. The landfill has an active Industrial Wastewater Permit (No. W-464583) issued by the IWMD, which allows a maximum discharge rate of approximately 66,200 gallons per day to an existing 8-inch sewer line. Following full build-out of the combined landfill, total discharge to the sewer is expected to be 49,000 gallons per day which is below the permitted limit.[20] Adoption of CUP 00-194 would not increase sewer discharge beyond what was already analyzed in the SEIR. Thus, impacts to sewage disposal would be less than significant.

4.10 Education (Libraries)

The Initial Study prepared for the FEIR did not identify schools as a topical issue that warranted examination. Impacts to libraries are discussed briefly in Section 4.14.6 (Libraries) of the SEIR, and Section 3.3.3 (Education) of the Addendum.

The closest libraries to the Project site are the City's Granada Hills Branch, located at 10640 Petit Avenue, and the Sylmar Branch, located at 13059 Glenoaks Boulevard. These libraries are located approximately 5 miles from the Project site. The combined City/County Landfill would not pose additional demands on library services or resources given that the proposed Project is industrial rather than residential. Adoption of CUP 00-194 would not alter the nature of the proposed Project; impacts would be less than significant.

4.11 Environmental Safety (Transmission Lines)

Impacts related to transmission lines are addressed in Section 4.9.8 (Transmission Lines) of the SEIR. Although environmental safety issues are discussed in the FEIR and the Addendum, these documents do not specifically address impacts related to transmission lines.

Based on information provided by SCE, exposure levels to electrical and magnetic fields (EMF) greater than those encountered at home would only occur when individuals are positioned within approximately 35 feet from the edge of the two existing 66 kilovolt (kV) electrical transmission lines that traverse the Project site.

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[20] Letter dated August 11, 2003, to Rodney Nelson, California Regional Water Quality Control Board, from David Edwards, Director of Projects, Browning-Ferris Industries of California, Inc.

[21] / Ibid.

At that distance, depending on the elevation of the transmission lines, magnetic levels of 5 mG or greater should be anticipated. Based on typical landfill operations, workers and heavy equipment operators would not be expected to spend a significant amount of time proximate to these lines or within their easements. A hauler depositing waste would only be within this area for a short period of time (approximately 5 to 7 minutes) to dispose of a load of waste. There is no substantial evidence directly attributing health risks to EMF that would impact landfill workers (nor other affected parties) when Project-specific activities place those individuals in close proximity to either the Newhall or West Saugus transmission lines. Impacts would remain less than significant.

4.12 Land Use (Solid Waste Management Plans)

While the FEIR and Addendum discussed impacts related to various land use plans, impacts specifically related to solid waste management plans were only discussed in Section 4.7.3 (Solid Waste Management Plans) of the SEIR.

The following City and County solid waste management plans were analyzed in the SEIR: *Solid Waste Management Status and Disposal Options in Los Angeles County, Los Angeles County Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Action Plan, City of Los Angeles Solid Waste Management Plan, City of Los Angeles Solid Waste Management Policy Plan, City of Los Angeles Source Reduction and Recycling Element, Integrated Solid Waste Management System for Los Angeles County, Los Angeles County Source Reduction and Recycling Element, Los Angeles County Countywide Integrated Waste Management Plan*, and *Los Angeles County Countywide Siting Element*. These plans either identified the need to provide an additional solid waste disposal capacity within Los Angeles County, or they specifically identified the expansion of Sunshine Canyon Landfill as a way to meet this need; therefore, the proposed Project would be consistent with these plans. With adoption of CUP 00-194, the land uses identified in the SEIR for a combined City/County landfill would be maintained, and the proposed Project would remain consistent with solid waste management plans. Thus, impacts would be less than significant.

4.13 Population / Housing / Employment / Recreation

Impacts related to population, housing, and employment are discussed in Section 2.0 (Description of Environmental Setting) and Section 5.1 (Growth-Inducing Impacts) of the FEIR; Section 4.10 (Population), Section 4.11 (Housing), Section 4.14.4 (Parks and Recreational Resources), and Section 4.14.5 (Hiking and Equestrian Trails of the SEIR; and Section 3.4.4 (Population/Housing/Employment/Recreation) of the Addendum.

The proposed Project would not result in adverse affects to population growth, housing, or employment. Firstly, the landfill would not be constructing new infrastructure to instigate growth. Operation of the landfill also would not indirectly induce growth because it would serve existing need or demand.[22]

Secondly, a residential valuation study prepared for the original County FEIR by Dr. Chapman Finley of JurEcon, Inc., entitled *An Evaluation of the Sunshine Canyon Landfill's Impact on the Value of Homes in Adjacent Residential Neighborhoods,*[23] determined that landfill development (or operation) was not expected to impact property values in the surrounding communities. A similar study was conducted for the Puente Hills Landfill during its environmental review. Findings of that study concluded that property values near the landfill were not impacted as a result of landfill development, nor of operation. It is expected that

[22]/ *FEIR*, Section 5.1, pp. 302-303.
[23]/ *FEIR*, Responses to Comments, Volume A, Appendix 7 (1989).

development of the proposed City/County Landfill Project would have no significant impact on the resale value of residential homes in the Project vicinity.

Thirdly, the proposed City/County Landfill Project would not result in the relocation of any persons from the Project site. No permanent residential units are planned for development as part of the proposed Project. The combined City/County Landfill is not expected to create an additional demand for residential housing, nor is it expected to affect existing housing stock in either the Project vicinity or region. Furthermore, implementation of the combined City/County Landfill is not expected to significantly impact the availability of rental housing in the Granada Hills-Knollwood Community Planning Area (CPA), nor the County Santa Clarita Valley area.

Moreover, the proposed Project would create direct and indirect short- and long-term employment opportunities; however, the extent of these opportunities is not significant, and can be accommodated by the region's existing labor force. Impacts related to population, housing, and employment would be less than significant.

On the other hand, development of the proposed Project would potentially constitute two sources of impact in regards to recreation. First, the proposed Project has the potential to generate additional employees, which would have the potential to increase demand on local park facilities. As referenced in the City of Los Angeles General Plan Framework Element, parkland deficiencies are projected to increase in both the Granada Hills-Knollwood CPA and Northwest Valley area of the City. Currently, the Granada Hills-Knollwood area has a neighborhood parkland deficiency of 77 acres and a community parkland deficiency of 90 acres. The Northwest Valley has a regional parkland deficiency of 378 acres. In fact, on a citywide scale, the City is deficient by 11,404 acres of neighborhood and community parkland and 8,481 acres of regional parkland.

Equally important, the planning area within the unincorporated County (closest to the Project site) has a parkland deficiency of approximately 13 acres. According to the County Department of Parks and Recreation, there is a deficiency of 13,296 acres of regional park land, including publicly owned "natural areas" in the County. It must be noted however, that the proposed Project is located in proximity to O'Melveny Park (a 695-acre City regional public recreation site), Bee Canyon Park (a 22-acre City community public recreation site), and the proposed Santa Clarita Woodlands State Park (ultimately comprising 8,005 acres).

Despite the above-noted deficiency, new employees at the landfill would not impact local park facilities for several reasons. First, landfill workers are not anticipated to use park facilities during the daytime hours, and park facilities in proximity to the landfill (e.g. O'Melveny Park and Bee Canyon Park) do not have nighttime lighting systems or facilities (e.g. tennis courts, ball fields) that would allow landfill employees to engage in nighttime sporting activities. Use of local parks by landfill employees would be limited to use during their days off and would generally occur during weekends and holidays.

Second, as part of the Settlement Agreement for the County Landfill, the Project Proponent is required to fund one community service project per year in an amount not exceeding $50,000 per year, for a period of 15 years, or until the termination of disposal operations (whichever occurs first) subject to the following conditions: community service projects shall be in the immediate vicinity of the landfill, as determined by the Los Angeles City Council, and community service projects shall involve physical improvements to new or existing community services such as construction of community swimming pools, community parks restoration or development, and community center rehabilitation or development.

Third, although the proposed Project (County portion) is located within a Priority 3 (lowest priority) acquisition area for the Santa Clarita Woodlands Park, this area is principally disturbed due to the operational

County Landfill and would therefore not be desirable for park use. Upon completion of landfill operations, this area would undergo State-mandated closure and 30-year postclosure maintenance.

Fourth, prior to opening the County Landfill, the Project Proponent dedicated over 426 acres within East Canyon for open space and recreational purposes, and dedicated 81 acres of road and trail easement areas. This acreage has become part of the Santa Clarita Woodlands Park. Additionally, the Project Proponent purchased over 490 acres along the northerly and westerly boundaries of Upper Bee Canyon immediately south of the landfill and transferred ownership to the Mountains Recreation and Conservation Authority (MRCA) for park and recreational use. This acreage will soon become part of the Santa Clarita Woodlands Park.

Thus, the incorporation of Project requirements ensures that impacts to recreation from landfill employees would be less than significant.

The second source of potential impact concerning recreation is that development of the City/County Landfill would not allow two potential local trails identified in the Rim of the Valley Trail Corridor Master Plan to be developed. The closest existing trail proximate to the Project site is located along the ridgetops of O'Melveny Park. This trail is approximately 3 miles long. A trail stop and horse assembly area has been proposed near the southeast entrance of this park, or Sesnon Boulevard. A segment of a proposed "backbone" trail system has been proposed south of the Project site. That segment would parallel Balboa Boulevard and Sesnon Boulevard and would eventually connect with the trail at O'Melveny Park.

The closest existing or proposed County hiking and equestrian trail to the Project site is the Gavin Canyon Trail. This is a proposed 8-mile trail that would join the San Fernando Valley trails with the Santa Clarita Valley trails. This trail would be located northeast of the Project site. Local trails identified in the Rim of the Valley Trail Corridor Master Plan include a potential extension east of Bee Canyon onto the existing County Landfill. This potential trail has been identified incorrectly as providing a wildlife habitat or corridor. In fact, it could potentially be used as a Scenic Resource Preservation Area. In addition, the Master Plan identifies another potential trail at the northern end of Sunshine Canyon. This trail would connect with the trail described above and would extend southeast across both City and County boundaries onto the City/County Landfill area. As noted in the Master Plan, this potential trail could be utilized as a trail/trail corridor, wildlife habitat or corridor, or a park, park facility, or picnic area.

The proposed Project's prevention of development of these two local trails would not constitute a significant impact given that (1) the development of hiking and equestrian trails within Sunshine Canyon with or without the development of the proposed Project would be in conflict with pre-existing landfilling operations, and (2) as discussed above, the Project Proponent has dedicated acreage in East Canyon and upper Bee Canyon as well as easements throughout the area, for hiking and equestrian uses. This dedicated acreage will provide regional hiking and equestrian trail linkage by connecting City-, County-, and State-proposed trails. The development of this trail connection within East Canyon and upper Bee Canyon would preclude the need for hiking and equestrian trails in Sunshine Canyon. Therefore, impacts would be less than significant.

4.14 Utilities (Solid Waste, Natural Gas, Communications)

Solid waste, natural gas, and communications are addressed in Section 3.2.11 (Public Utilities) and Section 3.2.12 (Fire Service) of the FEIR; Section 4.16.2 (Natural Gas), Section 4.16.3 (Communication Systems), and Section 4.16.7 (Solid Waste) of the SEIR; and Section 3.3.5 (Utilities/Other Services) of the Addendum.

Implementation of the proposed Project would not result in a significant amount of solid waste generation. However, as a result of Project development, construction debris would be generated during construction

phasing, including vegetation removed for excavation. Additionally, during grading operations, non-compatible soils and oversized materials may require removal. Construction and demolition wastes would include inert solids comprised of rock, concrete, brick, sand, soil, asphalt, and sheetrock.

The Project Proponent would utilize recyclable inert materials, since these materials can be reused in other construction applications, including materials such as concrete, asphalt, dirt, and wood waste. It is expected that no substantial volumes of these inert materials would be generated and that, to the greatest extent possible, materials generated would be recycled on-site or disposed of at the landfill. City/County Landfill employees would generate approximately 618 pounds (or 0.309 ton) of solid waste per day. Administrative/employee buildings would be provided with recycling bins and solid wastes not recycled would be landfilled on-site.

Regarding natural gas, the combined City/County Landfill would not impact natural gas service, because natural gas lines are not located on the Project site, nor are any extensions to existing gas lines currently proposed.

Also, based on the regional and local availability of communication infrastructure, telephone service can be readily extended to the Project site by fiber optic cable, which presently services the operational County Landfill.

Implementation of CUP 00-194 would not alter existing land uses, expand operations beyond what was analyzed in the SEIR for a combined City/County landfill, or otherwise generate impacts related to solid waste, natural gas service, or communications systems beyond what was analyzed in the FEIR and SEIR. Therefore, impacts would be less than significant.

4.15 General (Energy Resources)

Efficient use of energy resources was not analyzed in the FEIR. However, energy conservation is discussed in Section 4.15 (Energy Conservation-Fossil Fuels) of the SEIR and Section 3.4.1 (General) of the Addendum.

During construction, approximately 2,914 gallons of fossil fuels (e.g. diesel fuel for heavy equipment and delivery trucks and gasoline for worker vehicles) would be consumed by the proposed Project on a daily basis. During Project operations, approximately 6,710 gpd of diesel fuels would be consumed by transfer trucks and refuse collection trucks and by operating heavy equipment during daily landfilling operations. During Project operations, approximately 325 gpd of gasoline would be consumed on a daily basis by local delivery waste-hauling trucks, landfill employee commute trips, and local service vehicles. Overall, during the operation of the proposed City/County landfill, approximately 7,035 gpd of fossil fuels (diesel fuel and gasoline) would be consumed on a daily basis. Given the size of the Project and project needs, this amount of fossil fuel consumption is not considered wasteful, inefficient, or an unnecessary consumption of energy, since on-site operational equipment is only used as warranted, and employee trips are considered necessary.

Since fuel consumed by existing transfer trucks and collection vehicles is expended during the collection and disposal of refuse within the region, these trips are not considered new, nor do they augment the use of fuel. In addition, the siting of the Project proximate to the Los Angeles region would reduce travel distances for waste haulers who would otherwise drive to landfill sites greater distances away.

Adoption of CUP 00-194 would not increase operations beyond what was previously analyzed in the FEIR and SEIR. In fact, by enabling use of a single working face, adoption of CUP 00-194 would reduce the number of pieces of operational equipment, and it would result in a more efficient use of energy resources

than currently under the separately operating City and County landfills. Therefore, impacts would be less than significant.

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5.0 SIGNIFICANT OR POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT LEVELS

Based on the information developed in the preparation of the FEIR, SEIR, and Addendum, as well as the whole of the record in this matter, the County determines that the environmental effects listed below will not exceed levels that have been deemed significant, or, if significant, feasible mitigation measures have been identified in the FEIR, SEIR, or Addendum that will result in the avoidance or substantial reduction of those effects to a less than significant level. Based on the environmental analysis presented in the FEIR, SEIR, and Addendum, there has not been substantial evidence submitted or identified by the County which would indicate that the following impacts would occur at levels that would necessitate a determination of significance herein.

Note that the following listing of environmental effects follows the order of topical issues set forth in the County's 2004 Initial Study for the Addendum to the FEIR and SEIR.

5.1 Geotechnical

Reference: For a complete discussion of impacts relating to geotechnical hazards, see FEIR Section 3.2.1 (Geology); SEIR Section 4.1 (Earth Resources); and Addendum Section 3.1.1 (Geotechnical).

5.1.1 Potential Effect: Grading and Excavation. Grading and excavation for Project development have the potential to uncover landslide material or other unsuitable material. Erosion may occur on recent cut and/or fill areas. With the implementation of mitigation measures, no significant adverse impacts from landslides would occur.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Site grading for the proposed combined City/County Landfill footprint would result in the direct development of approximately 451 acres. Preliminary earthwork estimates for the proposed City/County Landfill footprint would include approximately 10 million cubic yards (cu. yd.) of excavation material. Rough grading quantities would be balanced on-site. Excess material from grading activities would be stockpiled and stored within designated areas of the City/County Landfill footprint and utilized throughout Project development.

2. Landslides have been identified within Sunshine Canyon (both City and County jurisdictions) by aerial photograph interpretation, detailed field mapping, and mapping of features exposed during site operations. The landslides are composed of matrix materials that include unconsolidated clay, sand, and boulders that enclose various sizes of sandstone, shale, and conglomerate blocks. The lithologic characteristics and positioning of the landslide masses indicate origins within the Towsley Formation. Landslide morphology is controlled by slips along bedding planes, or weak seams parallel to the bedding. Due to the favorable orientation of the geologic strata bedding, the footprint of the proposed City/County Landfill is relatively free of landslides.

3. One large landslide deposit was mapped in the area of the City/County boundary. The long axis of the landslide trends approximately southeasterly, and the maximum depth of the slide in that location ranges from approximately 40 to 70 feet. The landslide is a bedding plane block slide with movement along the bedding planes. The slide plane of this landslide is somewhat shallow; it will be excavated from the top down and will then be completely removed. Construction occurring within the landslide area would involve excavating the affected soils and ensuring that there are no resulting impacts on slope stability. The only other mapped landslide within the City is located southeast of the existing inactive City Landfill, and its removal would not impact Project development.

4. Excavated soils would be used on-site for uses such as the liner foundation layer, liner operations layer, daily cover, intermediate cover, and the vegetative or erosion control layer of the final cover.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified, and they have been (or will be) incorporated into the Project:

MM-1 During excavation, any unsuitable material encountered below the base grade for the landfill, including alluvium, organic material, and landslide debris, shall be removed. Engineered compacted fill shall be placed in those areas to restore the base grade for liner system construction. Excess material not used immediately for cover material shall be stockpiled on-site for future use. The unsuitable material shall be excavated, a portion at a time, as the working area of the landfill progresses to avoid opening large sections of potentially unstable material. A buffer area (i.e. 50 -100 horizontal feet or as deemed appropriate to maintain safe working conditions) shall be used between the active cells receiving waste and areas under excavation. In accordance with CCR Title 14, a certified engineering geologist shall delineate the limits of the unsuitable material and associated "backcuts" to facilitate removals during excavation. Removal shall not occur during the rainy season (October 1 - April 30) or when the ground is saturated, unless performed under the direction and specifications of a certified engineering geologist.

MM-2 When excavating for the landfill operation, if a landslide is encountered, all material constituting that landslide shall be removed. Excess landslide material not used immediately for cover material shall be stockpiled on-site for future use. If necessary, the landslide area shall be excavated a portion at a time to avoid opening large sections of potentially unstable material. A buffer area shall be maintained between the active landfill cells receiving waste and areas under excavation to remove overburden soils, landslide debris, and weathered bedrock. A qualified geologist shall delineate the limits of the landslide during excavation. Landslide removal shall not commence when the ground is saturated, unless removed under the direction and specifications of a certified engineering geologist.

MM-3 Areas of excavation and areas of loose soil (i.e. around haul roads, etc.) shall be stabilized to prevent erosion before the onset of the rainy season.

MM-4 Revegetation and erosion control of all exposed slopes will be an ongoing process. The erosion mitigation controls to be implemented at the site will include soil stabilization measures and revegetation in accordance with an approved Revegetation Program. The installation of interceptor ditches shall be designed for the diversion of all storm runoff

to sedimentation basins. Sediment traps will be used at points of runoff concentration along the perimeter of exposed slopes.

MM-5 To prevent erosion of the soil on the face of the landfill, interim vegetation measures will be taken after placement of the temporary soil layer even though the area may be disturbed by future filing operations. Vegetative cover will be placed as in the approved Revegetation Program.

MM-6 All grading activities shall be performed in accordance with applicable provisions of the County Code and with the rules and regulations as established by the County Department of Public Works.

MM-7 All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed Project, including provisions for excavation approved by the County Department of Public Works, the County Local Enforcement Agency (LEA) and other Responsible Agencies.

MM-8 Revegetation and erosion control procedures on all exposed slopes shall be implemented. The erosion controls to be implemented at the site shall include soil stabilization measures and revegetation in accordance with a revegetation plan approved by the County Department of Public Works. Interceptor ditches shall be designed to divert storm runoff to a sedimentation basin.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.1.2 Potential Effect: Seismic Hazards. Potential seismic hazards would include primary fault rupture, secondary ground rupture, and strong shaking.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The most significant geologic hazard to the proposed Project would be the potential for moderate to severe seismic shaking and associated ground rupture that is likely to occur during the design life of the Sunshine Canyon Landfill Project. The Project site is located in the highly seismic Southern California region within the influence of several fault systems that are considered active or potentially active. The San Fernando-Sierra Madre Fault, with a site-to-source distance of 3.0 miles is the closest fault to the Project site. In addition to known faults that could impact the site, recent research indicates that "blind faults" (faults that apparently have not broken the surface and display little or no surface expression) may underlie the Los Angeles Basin and adjacent areas.

2. Several small to moderate landslides occurred within the County portion of Sunshine Canyon following the 1971 San Fernando earthquake. Several small rock falls are known to have occurred within the City following the 1994 Northridge earthquake, and several small to moderate landslides occurred in steep drainage areas within the County following that event. However, all engineered cut-and-fill slopes remained stable during both the San Fernando and Northridge events. Although the natural slopes on the site are considered to be relatively

stable, the past occurrences of seismically induced slope failures suggest that there is a potential for future slope failures in the steeper areas within Sunshine Canyon.

3. Strong shaking can result in damage to the landfill waste containment system due to seismically induced displacement of the waste mass. Strong shaking can also induce landsliding in natural geologic materials that could, in turn, result in damage to the landfill containment systems (i.e. the liner, cover, leachate collection and removal, gas extraction, and surface water drainage systems).

4. Fill faces could become unstable during seismic activity if not properly constructed.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-9 Final designs for major engineered structures will be based on the results of the detailed stability analysis of potential seismic events.

MM-10 Areas outside of and above the cut and fill as shown on the conceptual grading plan shall not be graded, except for development of ancillary facilities or other related improvements. Additional grading may be necessary for slope stability or drainage purposes. Prior to undertaking any grading activities, the County Director of Public Works shall be notified and approve any additional grading based on engineering studies (in accordance with CCR Title 14) provided by the Project Proponent and independently evaluated by the County Director of Public Works.

MM-11 The landfill facility shall be designed and constructed to meet California Code of Regulations (CCR), Title 14, Division 7, Chapter 3, Article 7.8, § 17777 (Final Site Face) and CCR, Title 23, Division 3, Chapter 15, Article 4, § 2547 (Seismic Design) requirements "to withstand the maximum probable earthquake without damage to the foundations or to the structures which control leachate, surface drainage, erosion, or gas." Design consideration shall include strong ground shaking and secondary ground rupture. In addition, the Project Proponent shall comply with RCRA, Subtitle D, 40 CFR Part 258, Subpart B, § 258.13 (Fault Areas) which states "new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet (60 meters) of a fault that has had displacement in Holocene time . . ." The landfill design and seismic analysis will be reviewed by the RWQCB.

MM-12 An operations checklist shall be used by a registered engineering geologist for surveys following all earthquake events measuring 5.0 on the Richter scale (or greater) near the Project site. A comparison of operating parameters and site conditions before and after major earthquake events shall be made to verify that systems are operational as designed. Final designs for major engineered structures shall be based on the results of the detailed stability analyses of potential seismic events.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.1.3 Potential Effect: Liquefaction. Potential ground failure due to liquefaction could occur at the Project site. With the implementation of mitigation measures, no significant adverse impacts from liquefaction would occur.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

> Ground failure due to liquefaction is a process whereby water-saturated, loosely consolidated, cohesionless sediments lose strength and subsequently fail due to the strong shaking from earthquakes. The hazards associated with liquefaction range from minimal ground-cracking to sand boils, lateral spreads, and slumping. At the Project site, the potential occurrence of liquefaction is limited chiefly to the water-saturated alluvium located at depths of less than 30 feet in the canyon bottoms. These alluvial deposits would be removed during site preparation.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-13 Alluvium in the canyon bottoms beneath the footprint of the waste containment system and beneath ancillary structures shall be excavated and, if necessary, replaced with compacted structural fill during construction. A qualified geologist shall be on-site during construction activities to observe removal and replacement of alluvium and to verify that all alluvium within the landfill footprint has been removed prior to placement of any compacted fill or construction of any containment system elements.

MM-14 The landfill facility shall be designed and constructed in accordance with RCRA, Subtitle D, 40 CFR, Part 258, Subpart B, § 258.14 (Unstable Areas) so that there would be no liquefaction-related impacts.

MM-15 The landfill facility shall be designed and constructed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 3, § 2530(d) (Classification and Siting Criteria), which requires that "all containment structures at waste management units shall have a foundation or base capable of providing support for the structures and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift as certified by a registered civil engineer or certified engineering geologist."

The analysis presented in the Addendum indicates that additional mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.1.4 **Potential Effect: Slope Failure.** Potential slope failure could occur in the steeper areas within Sunshine Canyon. With the implementation of mitigation measures, no significant adverse impacts from slope failure would occur.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Several small to moderate landslides occurred within the County portion of Sunshine Canyon following the 1971 San Fernando earthquake. Several small rock falls occurred within the

City portion of Sunshine Canyon, and several small to moderate landslides occurred in steep drainage areas within the County portion following the 1994 Northridge earthquake. However, all engineered cut-and-fill slopes remained stable during both the San Fernando and Northridge events.

2. Although the natural slopes on the site are considered to be relatively stable, the past occurrences of seismically induced slope failures suggest that there is a potential for future slope failures in the steeper areas within Sunshine Canyon. Little evidence has been found by consulting geologists that might indicate the presence of recent downslope failures in the larger, older landslide deposits. The absence of instability in the older landslide deposits indicates that their present configurations are in static equilibrium.

3. Canyon slopes at the Project site are sometimes steeper than 1H:1V (horizontal to vertical), although they are typically 2H:1V. Stability analysis of existing landslides indicates that, unless adverse (out-of-slope) bedding conditions are present, 1H:1V slopes in the native material are stable under both static and seismic loading. When adverse bedding is present, slope angles of 2H:1V or flatter may be required to provide adequate static stability. Pseudo-static stability analyses for seismic loading and observations of the performance of slopes at the site during the San Fernando and Northridge earthquakes indicate that, when natural slopes at the Project site have adequate static stability, the slopes perform well under seismic loading.

Based on the analysis presented in the FEIR, the following mitigation measure was identified and incorporated into the County Landfill:

MM-16 Final maximum refuse slope gradient at the site will be no steeper than 3H:1V (horizontal to vertical) for the landfill.

Based, however, on the updated analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-17 Final maximum refuse slope gradient at the site shall be no steeper than 2H:1V (horizontal to vertical) for the landfill.

MM-18 Final cut-and-fill slopes shall have an overall slope gradient no steeper than 1.5H:1V.

MM-19 Final slopes shall be engineered to have a static factor of safety of at least 1.5.

MM-20 Survey monuments shall be installed around the perimeters of the outer fill areas at points where they would not be subject to disturbance by landfill development. The exact spacing, location, and characteristics of the survey monuments shall be submitted to and approved by the LEA.

The analysis presented in the Addendum indicates that additional mitigation measures beyond those identified in the SEIR are not required.

5.2 Fire Hazards

Reference: For a complete discussion of impacts relating to fire hazards (note that fire protection service is discussed separately), see SEIR Section 4.9.4 (Employee Safety and Security) and Section 4.9.6 (Risk of Explosion), and Addendum Section 3.1.3 (Fire).

5.2.1 **Potential Effect: Subsurface Fires.** The proposed Project has the potential to result in landfill subsurface fires; the acceptance of "hot loads" has the potential to create significant fire hazards.

Findings: The County hereby finds that changes or alterations have been required in (or incorporated into) the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A "hot load" is defined as a truck that may bring ignited refuse onto a landfill site. If a hot load is brought onto the Project site, landfill personnel would direct the load to an isolated area of the site where it would be properly extinguished with either tracked dozers, scrapers, or other fire-suppression measures, including water, dry chemical extinguishers, or smothering.

2. Subsurface fires are triggered by the burial of a hot load igniting other refuse materials, the improper operation of the LFG collection and flaring system, or the inadvertent burial of chemical waste. Generally, subsurface fires are dependent on waste composition, moisture content, available oxygen, ambient soil-air pressure, and the insulating characteristics of the surrounding fill-and-cover material. Impacts from a subsurface fire would result in accelerated local settlement in the vicinity of the fire or the venting of smoke or combustion of byproducts through the landfill cover material. This type of fire is minimized by landfill design features, in-place control features used during the operation of the LFG collection and flaring system, and the proper application of cover material.

Based on the analysis presented in the SEIR, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-21 The Project Proponent shall provide fire control in compliance with CCR, Title 14, Division 7, Chapter 3, Article 7.6, § 17741 (Burning Wastes). If burning waste is received at the landfill site, it shall be deposited in a safe, isolated area of the landfill and extinguished. If burning waste has been deposited at the working face area, it shall immediately be excavated, spread, and extinguished.

MM-22 In the event the Project Proponent detects settlement or venting of smoke, the LEA shall be contacted. The Project Proponent, under the direction of the LEA, shall undertake appropriate measures to identify the location of the subsurface fire and implement the appropriate fire control techniques to assure the fire has been extinguished.

The analysis presented in the Addendum indicates that additional mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.2.2 **Potential Effect: Explosion.** Improper operation of the LFG collection and flaring system and/or excavation of an unrecorded, abandoned well could result in an explosion.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Project Proponents are required by law to install an LFG collection and flaring system. The existing inactive landfill, which is in the process of landfill closure and eventual postclosure maintenance, has an existing LFG collection and flaring system installed, which is constantly monitored and maintained by on-site landfill personnel. The LFGs collected within this system are currently flared.

2. Regulations require that on-site structures be constantly monitored to ensure that there is no buildup of methane, nor of any other LFGs associated with the disposal of solid wastes. On-site monitoring within habitable structures at the Project site has not revealed any unsafe concentrations of methane gas exposure to occupants.

3. During a significant seismic event, the LFG collection and flaring system could malfunction and cause an explosion. The proposed system would be similar to the existing LFG collection and flaring system for the existing inactive landfill. For example, during the Northridge earthquake on January 17, 1994, the system successfully shut down, which effectively reduced any potential for a risk-of-upset situation. The existing system did not sustain any damage, and was in operation for 2 days after the earthquake. The proposed LFG collection and flaring system would have similar shutoff controls in order to reduce any potential for LFG-related explosions.

4. The Project area is located adjacent to the Cascade Oil Field; both active and abandoned well sites are located in proximity to the Project site. While none has been noted within the Project site during landfilling operations, the remote possibility does exist that an abandoned wellhead may be encountered during excavation activities.

5. Abandoned wells typically contain 10 to 25 feet of concrete at the surface and a metal cap. The potential to remove a wellhead is extremely remote due to the amount of concrete used at the surface area, as well as the metal cap enclosure. Because heavy equipment operators are trained to recognize by sound and "feel" when an object is struck, any potential obstructions would be investigated during excavation activities.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-23 On-site structures shall be continuously monitored for the presence of unsafe levels of methane gas.

MM-24 If necessary, the Project Proponent shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.

MM-25 Risks associated with the gas collection and flaring system shall be mitigated through use of flexible piping, flame arrestors, sensors, and automatic shutoff controls. Numerous safety shutdown devices have been designed and installed into the flare station, including a telephone auto-dialer, to provide emergency notification. All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground-shaking from an earthquake, and necessary action shall be taken to correct any potential problems.

MM-26 Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction, all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.

MM-27 A portable explosive gas detection device shall be used to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, Gas and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from the Department is received. If gas is not detected, a backhoe or similar type equipment shall be brought in to further expose the obstruction. If necessary, well abandonment procedures shall be utilized following Department protocol.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.3 Noise

Reference: For a complete discussion of impacts relating to noise, see FEIR Section 3.2.9 (Noise); SEIR Section 4.5 (Noise); and Addendum Section 3.1.4 (Noise).

5.3.1 Potential Effect: Ambient Noise. Increased noise levels may be audible to nearby sensitive receptors as a result of additional traffic due to heavy construction equipment, worker commute trips, and delivery trucks associated with Project development.

Findings: The County hereby finds that changes or alterations have been required in (or incorporated into) the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The construction sequencing of the proposed Project would not significantly impact the existing ambient noise levels at any of the selected noise-reading locations. Noise would also be produced by construction workers and delivery trucks accessing the site. Truck traffic is projected to be approximately eight trucks per day, and construction worker traffic is projected to be 70 vehicles per day. The main point of potential impact would be at the landfill entrance at San Fernando Road because all construction workers would use this access roadway and certain receptors are located directly across the street. It is anticipated that 70 trips would be added to the existing 1,970 vehicles that already use San Fernando Road during the A.M. peak hour. An additional 70 vehicles would add less than 0.2 dBA (decibels on an A-weighted scale) to the peak-hour traffic noise (and far less to the community noise equivalent level [CNEL]). This impact would not be considered audible , nor would it present a significant noise impact on sensitive receptors in the immediate area.

2. The nearest residential unit is located approximately 1,700 feet southwest of the southernmost portion of the proposed Project footprint. This receptor is effectively shielded from the Project area by a ±100 acre landscaped buffer zone and an intervening ridgeline.

3. Some other residential units are located approximately 5,000 feet north from the Project site and northeast of the I-5 Freeway. The intervening north ridgeline within Sunshine Canyon and the extended distance between the Project site and these receptors serve as an effective buffer and shield these units from any potential noise impacts originating from landfilling operations. Noise at this location is further masked by existing noise sources from the freeway and other nonlandfill-related urban noise sources.

4. The noise emanating from the County portion of the Project site is not audible to the residential developments located south of the Project site.

5. All proposed operational activity related to the proposed Project would take place within the confines of Sunshine Canyon and below existing ridgelines. Therefore, any sound from landfilling operations would be blocked from these areas by the existing landfill, intervening terrain, and landscape berming within the ±100 acre buffer zone. Any landfill operation noise that may be audible at the trailers located across from the landfill entrance would be attenuated by the extended distance and masked by existing I-5 Freeway, railroad, and wood chopping operational noise. Consequently, any potential noise impacts associated with landfill operations would be from increased truck traffic located in proximity to noise receptor locations.

Based on the analysis presented in the FEIR, SEIR, and Addendum the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-28 Because of the proximity of the landfill site to residential areas, citizens, small commercial users, and private users of the landfill shall be encouraged by the Project Proponent by on-site signage, flyers, mailers, and the like to use alternate routes (other than Balboa Boulevard).

MM-29 All landfill equipment shall be equipped with air flow silencers on intake systems and low-noise mufflers on exhaust systems that shall be properly maintained.

MM-30 The Project Proponent will investigate options for other frequency backup alarms which meet State and Federal OSHA requirements.

Based on the analysis presented in the FEIR, SEIR, and Addendum, mitigation measures limiting the landfill operating hours have been identified. With approval of CUP 00-104, these mitigation measures will be replaced with the following single mitigation measure that will apply to the County side of the landfill:

MM-31 Landfilling operations shall be limited to the hours from 6:00 A.M. to 6:00 P.M., Monday through Friday, and from 7:00 A.M. to 2:00 P.M. on Saturday, except for site preparation and related activities, which can commence one hour prior to the receipt of waste. The landfill entrance gate shall be open to waste-hauling vehicles at 5:00 A.M., Monday through Friday, and at 7:00 A.M. on Saturday to provide for truck and vehicle queuing. However, Saturday operating hours may be extended to accommodate post-holiday disposal requirements, and both weekday and Saturday operating hours may be extended when deemed necessary by the LEA to handle disposal for public health and safety reasons.

The analysis presented in the Addendum indicates that additional mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.4 Water Quality

Reference: For a complete discussion of impacts relating to water quality, see the FEIR Sections 3.2.2 (Surface Water) and 3.2.3 (Groundwater); SEIR Section 4.3 (Surface and Groundwater); and the Addendum Section 3.2.1 (Water Quality).

5.4.1 Potential Effect: Surface Water. Implementation of the proposed Project would change the existing surface water patterns and hydrologic conditions at the Project site. Construction grading and the removal of surficial vegetation would remove existing barriers that currently act to dissipate (i.e. slow down and reduce) water runoff from the site. As a result, the proposed Project has the potential to increase the surface water runoff and peak discharge, increase erosion and sediment transport, and decrease surface water quality due to increased sediment loads.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A small portion of the Project site (i.e. near the bottom of the canyon where the creek flows off-site) is designated in Zone A in the 1980 version of Panel 0005C. Zone A is classified for a 100-year floodplain.

2. Surface water runoff from precipitation, flow from tributary channels, and erosion caused by these flows converge at the mouth of Sunshine Canyon near the landfill entrance. Drainage originating in Sunshine Canyon is controlled through surface water drainage channels, interceptor ditches, pipelines, and sedimentation basins. On-site sedimentation basins are designed to control the sediment load transported by surface water runoff and contain the ultimate peak discharge from both a 50-year, 96-hour storm event (the Los Angeles County standard) and a 100-year, 24-hour storm event (the State Water Resources Control Board [SWRCB] standard).

3. Off-site, surface water from the Project site flows underneath San Fernando Road into an 8-foot-wide box culvert that is maintained by the City Bureau of Engineering (BOE). The culvert is approximately 120 feet long and releases surface water into the Weldon Canyon Flood Control Channel, which is located directly east of the site entrance across San Fernando Road. This channel is part of the City's flood control system. Drainage in this channel flows south for approximately 2 miles, and then passes through a debris basin located directly west of the Los Angeles Reservoir. After passing through this basin, surface water enters the Bull Creek Flood Control Channel located approximately 3.5 miles south of the Project site. This channel is owned, operated, and maintained by the County Department of Public Works (DPW), Flood Control Division. Surface water then enters the Sepulveda Dam approximately 11 miles south of the Project site. This dam is owned, operated, and maintained by the U.S. Army Corps of Engineers (Corps). Both the Bull Creek Flood Control Channel and the Sepulveda Dam have sufficient volume capacity to accommodate regional stormwater flows.

4. The landfill has several drainage control improvement features (e.g., benches, interceptor ditches, and concrete drainage channels) to divert surface water runoff away from the landfill. These control improvements are maintained regularly and closely monitored during the rainy season so that any necessary repairs or maintenance can be performed in an

expeditious manner. Any areas of ponding or erosion damage at the landfill have been (and will be) repaired upon discovery, as weather permits.

5. All wastewater discharges in the Los Angeles region whether of surface or groundwaters are subject to Waste Discharge Requirements (WDRs), which are submitted and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). In addition, the U.S. Environmental Protection Agency (USEPA) has delegated responsibility to the State and LARWQCB for implementation of the federal National Pollutant Discharge Elimination System (NPDES) program. The WDRs for discharges to surface waters also serve as NPDES permits. These programs are intended to regulate controllable discharges. It is illegal to discharge wastes into any waters of the State without obtaining appropriate WDRs or NPDES permits. WDRs Order No. 91-091 regulates water quality on the County portion of the landfill, while WDRs Order No. R4-2003-0155 regulates water quality on the City portion of the landfill.

6. Basic NPDES component requirements include discharge limitations, standard requirements and provisions outlining the discharger's general discharge requirements and monitoring and reporting responsibilities, and a monitoring program to collect and analyze samples and submit monitoring reports to the LARWQCB.

7. The general NPDES permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that emphasizes stormwater best management practices (BMPs). New dischargers must submit a Notice of Intent (NOI) and develop and implement a SWPPP prior to commencement of operations. All dischargers must prepare, retain on-site, and implement a SWPPP. The NOI is a standard set of forms (including an accompanying site plan) that provides basic information about the landfill facility, its location, and potential for stormwater discharge. In general, the SWPPP describes site conditions and activities that identify sources of pollution that may affect stormwater discharge quality, describes appropriate stormwater management practices that would reduce pollution in stormwater discharges, certifies that nonstormwater discharges have been eliminated, and provides annual verification through on-site inspection that all elements of the SWPPP are in compliance. The SWPPP for the operating County Landfill is retained on-site.

8. The Project site is within the 900-square-mile (sq. mi.) Los Angeles River Watershed Basin and the Sunshine Canyon watershed. The Los Angeles River is the major drainage system in this basin. The upper reaches of the river carry urban runoff and flows from the San Fernando Valley. Below the Sepulveda Dam, flows are dominated by tertiary-treated effluent from several municipal wastewater treatment plants. Because the watershed is highly urbanized, urban runoff and illegal dumping are major contributors to water quality impairment.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-32 To ensure that infiltration of surface water into completed landfill cells is minimized, surface runoff shall be intercepted and diverted around the landfill. The method of diversion used at the Project site shall include the use of lined interceptor ditches placed along the edges of the landfill areas. This system of ditches shall flow into monitored sedimentation basins. After sediment content has been reduced, surface waters shall flow into the existing flood control channel directly east of the Project site entrance.

MM-33 As development of the site proceeds, surface drainage systems shall be maintained so that surface runoff is diverted away from working slopes and isolated from landfilled refuse. On-site drainage channels would be designed per CCR, Title 23, Division 3, Chapter 15, Article 3, § 2533(C), and County of Los Angeles Public Works Department, Flood Control Division requirements.

MM-34 Permanent bench drainage ditches shall be installed when final cover is placed on completed portions of the landfill. These ditches shall be lined. Temporary unlined drainage facilities consisting of diversion ditches (V-ditches) where necessary shall directly intercept natural surface runoff. Any intermittent channel flow in the existing canyon bottom shall be captured, channelized, and conveyed into a sedimentation basin. Diversion ditches shall convey surface runoff from the undisturbed areas to the permanent perimeter ditches for safe transport around the landfill footprint. Surface covers of various types, from mulches to vegetation, shall be used to retard erosion from areas of disturbance. In addition, areas of disturbance shall be kept at a minimum during active filling operations.

MM-35 As filling operations progress upward in elevation and laterally across the canyon, both permanent and temporary drainage facilities shall be used to provide appropriate drainage protection. The lower-elevation portions of the landfill working face shall be placed under final cover as soon as final grade is attained, and bench ditches shall be installed that will connect to adjacent, permanent perimeter ditches. These ditches shall connect directly to the temporary diversion drainage ditches that will protect the active landfill areas from natural surface runoff.

MM-36 In order to monitor the effectiveness of those measures designed to prevent pollution from entering the off-site stormwater system, the Project Proponent shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs.

MM-37 The surface water collection system shall be designed to collect runoff and collect/retain suspended solids. Water leaving the sedimentation basins shall be monitored in accordance with NPDES requirements.

MM-38 Surface water quality shall be monitored by collecting water samples from the sedimentation basins to ensure that water quality protection standards (contaminant levels), as determined for the site by the LARWQCB, are not exceeded. This monitoring program will continue for the active life and post-closure monitoring period of the landfill.

MM-39 Sediment shall be cleaned out of the sedimentation basins after every significant storm.

MM-40 The final landfill cover shall be compacted and graded with a minimum 3-percent gradient to preclude percolation of rainwater and direct surface water runoff away from the landfilled refuse and into drains that ultimately discharge into the monitored sedimentation basins.

MM-41 An erosion control plan would be implemented by the Project Proponent to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles would be stored or parked in areas protected from stormwater runoff.

Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls would be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.

MM-42 A preventive maintenance program would be implemented by the Project Proponent, including inspection of facility equipment, systems, and stormwater management devices to detect conditions that may cause breakdowns or failures resulting in discharge of materials into stormwater. This program applies to the on-site drainage ditches, rip-rap, berms and dikes, dust control, silt fences, diversion grading, and pavement surfaces. Each system and piece of equipment would be inspected monthly. Procedures for inspection would vary based on the piece of equipment or system. However, the major elements of the inspection program would include checking for cracks or structural failures, inspecting parts or pieces of equipment nonfunctioning, checking for the degradation or deterioration of operating units, and investigating the need for cleaning or emptying units.

MM-43 Placement of a series of underdrains in areas where seeps and springs have been identified will collect and convey any water from these sources.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the proposed Project:

MM-44 County Department of Public Works storm/surface water standards will be met.

MM-45 The proposed Project will have a sedimentation basin within the canyon designed to accommodate a capital storm requirement with a 24-hour time duration.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.4.2 Potential Effect: Groundwater. Leachate from saturated refuse has the potential to migrate and degrade the existing groundwater quality. In addition, the installation of a 12,000-gallon underground tank diesel fuel storage tank has the potential to degrade existing groundwater, if ruptured.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The site is located within the San Fernando Hydrologic Subarea of the San Fernando Valley Groundwater Basin, Sylmar Subbasin. Volatile organic compounds (VOCs) and nitrates from industry, subsurface sewage disposal, and past agricultural activities are the primary pollutants of the San Fernando Valley Groundwater Basin. Designated potential beneficial uses of groundwater within the subarea include municipal, industrial, and agricultural water supply.

2. Groundwater at the Project site generally flows in a south to southeast direction toward the mouth of Sunshine Canyon. Results of the drilling program and subsequent water level readings indicated that confined groundwater conditions may exist at numerous locations within the Project site. Groundwater in the uppermost aquifer occurs under unconfined conditions in the alluvial sediments and generally under confined conditions in the top weathered zone of the Towsley Formation. The lower bedrock zone was found to occur under confined conditions. Available groundwater studies indicate that potentially limited groundwater resources lie beneath the Project site. The possibility for groundwater migration was effectively cut off by the installation of the groundwater extraction trench across the bottom of Sunshine Canyon in 1990. The trench is approximately 200 feet long and is located across the access roadway near the southeast toe of the inactive landfill. In 2004, a cut-off wall was installed downgradient of the extraction trench so as to further ensure separation between the groundwater in Sunshine Canyon and the San Fernando Groundwater Basin.

3. Numerous springs and seeps have been discovered primarily in the County portion of Sunshine Canyon. The potential exists for these springs and seeps to occur within the Project site. Generally, these springs and seeps are exposed during construction, grading, and removal of the alluvial materials during excavation activities. A subdrain system was installed beneath the County side of the landfill to capture and control springs and seeps and convey water into the existing sedimentation basin.

4. Groundwater monitoring wells are installed at the Project site to monitor groundwater conditions and water quality. Since installation, groundwater has been sampled and analyzed quarterly for possible contamination. This network also includes leachate monitoring wells and a groundwater extraction trench. Results of the testing on both surface and groundwater samples indicated that the waters of the Sunshine Canyon watershed are of poor quality and unfit for use as a drinking water source. Concentrations of constituents in the groundwater, including chloride and VOCs, have been detected at the Project site.

5. On the City side of the landfill, the vadose zone is monitored quarterly by five lysimeters that have been installed within Sunshine Canyon. The vadose zone is defined as the area below the landfill and above groundwater where water may be present or suspended in the weathered bedrock or soil. The presence or absence of this water is monitored through the use of lysimeters, which are special wells designed to permit the measurement of water that may be in the pores of the soil or weathered bedrock above the groundwater zone. These wells provide monitoring of the alluvial deposits to detect seasonal flow within Sunshine Canyon.

6. Excess water use or water spreading at or near the landfill may result in leachate generation and have an adverse impact on the existing groundwater conditions. Excess water used for irrigation on slopes to support vegetative growth and dust control could create the potential for leachate formation within the landfill mass.

7. Potential impacts could occur as a result of installing a 12,000-gallon underground diesel fuel storage tank.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-46 As the landfill is constructed, all alluvium will be removed to solid bedrock, thereby removing any connection with groundwater-bearing alluvium downgradient within the canyon.

MM-47 In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the liner system shall be placed under the entire landfill footprint, including the canyon bottom and side slopes. Design details of each site-specific liner system to be constructed shall be described in detail in the Project Proponent's ROWD for the landfill facility. The liner systems shall be constructed and field tested in accordance with strict quality assurance/quality control (QA/QC) procedures pursuant to criteria submitted to and approved by the LARWQCB prior to construction.

MM-48 Areas of natural groundwater seepage shall be intercepted by the installation of a subgrade gravel drainage blanket. A series of underdrains shall be placed in areas where seeps and springs have been identified, and they shall collect and convey any water from these sources to the sedimentation basin. In the event any chemical constituents are in the seep water, the seep waters will be sampled, analyzed, collected, and then sent either to the on-site leachate treatment facility or off-site for proper treatment and disposal. The nature and source of the seep would be investigated, including additional sampling and laboratory testing.

MM-49 The leachate collection and removal system (LCRS) shall be installed at the base and side slopes of the landfill. This system shall be designed and installed to collect generated leachate for disposal consistent with LARWQCB requirements. The collection system shall consist of a filter rock blanket embedded with a system of collection pipes or a geosynthetic alternative that collects and transports the fluid to a holding tank. In accordance with RCRA, Subtitle D, 40 CFR, Part 258, the collection system shall be designed to limit the hydraulic head on the liner to less than 12 inches. Collection pipes shall be sized and spaced to reduce the hydraulic head in the leachate collection system. Leachate shall be recovered and treated on-site. The treated leachate shall be sampled on a regular basis to affirm suitability for reuse on-site.

MM-50 Final design and operating conditions for the leachate removal and treatment system shall be as specified by the LARWQCB in the proposed landfill's WDRs. The LCRS shall be designed and installed in accordance with CCR, Title 23, Division 3, Chapter 15, Article 4, § 2543 (Leachate Collection and Removal Systems), which requires that the LCRS be designed, constructed, maintained, and operated in a manner that collects and removes twice the maximum anticipated daily volume of leachate from the waste management unit.

MM-51 A gas collection layer shall be placed beneath the liner system where it overlies the existing inactive landfill to mitigate the potential for LFG migration.

MM-52 Pursuant to the 1999 City approval, the existing groundwater monitoring wells located within the City portion of Sunshine Canyon will continue to be monitored during the development of the proposed Project; and the monitoring system may be revised as construction progresses in the areas where wells are located as approved by the LARWQCB.

MM-53 A preliminary closure/postclosure plan shall be provided as part of the operating permit for the landfill. Closure regulations are contained in the CCR, Title 23, Division 3,

Chapter 15, Article 8 (Closure and Postclosure Maintenance), § 2580 (General Closure Requirements) et seq. Completion of landfilling operations will occur once final approved elevations are reached.

MM-54 The design, operation, and final closure of the Project shall be monitored by the LEA, CIWMB, and LARWQCB to ensure that the landfill will not create significant environmental impacts on local or regional water supplies.

MM-55 Application of daily, intermediate, and final covers in accordance with applicable regulatory requirements shall aid to restrict leachate formation by inhibiting the infiltration of water into the landfill waste prism.

MM-56 Dust control water shall be applied to wet only the upper soil surface.

MM-57 The Project shall be operated as a Class III landfill and shall not accept hazardous materials or liquid waste. Further restrictions will be identified in the future WDRs required prior to Project development.

MM-58 Pursuant to the 1999 City approval, and as approved by the City LEA and the LARWQCB, prior to the placement of new waste in the City portion of Sunshine Canyon previously used for landfilling, a final cover shall be placed upon any inactive portion of the City landfill at its interface with the new landfill extension. This final cover will prevent conductivity between the inactive City landfill and the proposed new landfill extension. An independent inspector will be on-site during the placement of this final cover for verification that required conditions of installation are met to the satisfaction of the City LEA and the LARWQCB.

MM-59 Underground diesel fuel storage tanks will be installed, monitored, and inspected in compliance with CCR Title 23, Division 3, Chapters 16 and 17, and applicable provisions of the County Code. Underground tanks would be double-walled and have sufficient secondary containment and a leak interception and detection system to prevent fluid migration.

Based on the LARWQCB WDRs No. R4-2003-0155, the following mitigation measures have been identified and have been (or will be) incorporated into the City side of the Project:

MM-60 In compliance with LARWQCB WDRs No. R4-2003-0155, the City side of the landfill has installed and shall continue to install a double composite base and side slope liner system. The base liner system shall contain, from top to bottom, the following components: a minimum of two-foot-thick protective soil layer; a minimum one-foot-thick granular drainage layer; a high density polyethylene (HDPE) geomembrane at least 60 mils thick; a compacted clay layer at least two feet thick, with a hydraulic conductivity of no more than 1×10^{-7} cm/second, or a geosynthetic clay liner (GCL), with a saturated hydraulic conductivity of no more than 5×10^{-9} cm/second; a drainage and leak detection layer; a HDPE geomembrane at least 60 mils thick; a compacted clay layer at least two feet thick with a hydraulic conductivity of no more than 1×10^{-7} cm/second; and prepared base geological material.

The sideslope liners system shall contain, from top to bottom, the following components: a minimum two-foot-thick protective soil layer; a HDPE geomembrane at least 60 mils thick; a GCL with a saturated hydraulic conductivity of no more than 5×10^{-9} cm/second;

a drainage and leak detection layer; a HDPE geomembrane at least 60 mils thick; a GCL with a saturated hydraulic conductivity of no more than 5×10^{-9} cm/second; and prepared base geological material or final cover of the existing City Landfill Unit 1.

Based on the analysis presented in the FEIR, the SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the County side of the Project:

MM-61 As approved by the LARWQCB, the Project site on the County side of the landfill will incorporate a liner system of equal or better effectiveness to that installed on the City side of the landfill, as described in MM-60, above. The liner system is designed to take into account the various site-specific conditions typically encountered in the construction of canyon landfills. The liner system will be constructed and field tested in accordance with strict Quality Assurance/Quality Control (QA/QC) procedures and criteria submitted to and approved by the RWQCB prior to construction, and it shall exceed the minimum standards specified in Chapter 15, Title 23 of the CCR.

MM-62 The placement of a soil liner upon side slopes will be accomplished in accordance with the requirements specified by the LARWQCB.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.5 Air Quality (Odor)

Reference: For a complete discussion of impacts relating to odor, see the FEIR Section 3.2.7 (Odor/Landfill Gas); the SEIR Section 4.2 (Air Quality); and the Addendum Section 3.2.2 (Air Quality).

5.5.1 Potential Effect: Odor. Waste materials received daily at the proposed landfill and landfill gases (LFGs) resulting from decomposing wastes have the potential to emit detectable odors.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant environmental effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Two potential sources of odor are generally associated with most landfilling operations. The first source is directly related to the specific types of refuse brought to the landfill prior to emplacement, compaction, and the application of daily cover material. This potential source of odor is primarily based on factors that include the type of materials comprising waste, age of the refuse, acidic content of the waste (pH level), moisture content in the refuse, degree to which the refuse is compacted at the landfill, particle size, temperature, and degree of mixing and types of organics present.

2. The second source of odor is from the methane-related gases produced from the anaerobic (oxygen-free) microbial decomposition of organic matter in refuse that produces natural LFGs.

3. The proposed landfilling operations are located at sufficient distances from the potential receptors (residential) and separated by sufficient terrain (1,700 feet to the nearest residence), so that no odor nuisance from refuse emplacement should occur. Additional barriers include the inactive City landfill, which is approximately 300 feet in height, and a ±100 acre buffer area. These two features pose sufficient screening and distance to inhibit the transmission of odors beyond the Project site boundaries.

4. Carbon Dioxide (CO_2) (38 to 46 percent) and methane (53 to 60 percent) are the two main constituents of the natural LFGs produced, neither of which has a perceptible odor to humans. However, trace amounts of other gases that are malodorous are also produced during anaerobic decomposition. As the natural gases are generated within the landfill cells, internal landfill cell pressures move the gases within and away from the landfill along paths of least resistance. Generally, anaerobic processes begin locally and are then followed by the depletion of oxygen in isolated pockets. Processes peak in CO_2 production which typically occurs approximately 11 to 40 days after refuse emplacement. The methane-forming microorganisms begin formation approximately 1 to 2 years after landfilling. Odors can occur when the landfill surface, due to differential waste settlement, subsidence, or cracks, allows the LFG to escape into the atmosphere.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-63 The natural biological processes that generate odors in a landfill through anaerobic decomposition cannot be prevented or avoided. However, the LFGs can and will be prevented from escaping to the atmosphere through the use of control measures. These measures include using daily and intermediate cover material over deposited wastes, filling any surface cracks with clean dirt as necessary, and extracting LFG through the use of an LFG collection and recovery system and destroying collected gases by combustion.

MM-64 Operational techniques shall be used to control odor sources at the landfill. The size of the working face shall be limited so that the area of waste exposed to the atmosphere is kept to a minimum.

MM-65 Solid waste shall be compacted within 1 hour of its arrival at the working face.

MM-66 The LFG collection and recovery system shall be installed in phases as each portion of the landfill site is filled. The final system shall contain a network of gas extraction wells, collection system piping, and flaring facilities. Because the LFG generation begins at lower levels of volume and increases during the landfill site life, the gas will be flared initially until sufficient quantities are available for processing into electricity.

MM-67 If an odor problem should develop, appropriate control measures shall be implemented. These measures include the application of daily cover material or more frequent application of the cover material to seal the landfill surface, or adjustments to the wells, equipment, and operation of the LFG collection and recovery system.

MM-68 To ensure that odors are kept to a minimum, the following odor/LFG monitoring program shall be implemented for the proposed Project. The monitoring program shall comply with the requirements of SCAQMD Rule 1150.1 and include the following:

- Sample Probe Installation: One monitoring probe per 1,000 feet of landfill perimeter shall be installed to identify potential areas of subsurface LFG migration. These probes shall be monitored to ensure that large quantities of LFG do not vent off-site through subsurface soils.

- Integrated Landfill Surface Samples: The landfill surface shall be monitored to ensure that the average concentration of total organic compounds over the landfill surface does not exceed SCAQMD's standard of 50 ppm.

- Ambient Air Sampling: 24-hour integrated gas samples and required meteorological data shall be taken to assess any impact the landfill is having on the ambient air quality at the landfill perimeter.

- Instantaneous Landfill Surface Monitoring: Spot checks on the landfill surface shall be made to determine the maximum concentration of total organic compounds measured as methane, at any one point on the surface of the landfill does not exceed the SCAQMD's standard of 500 ppm.

- Regular Monitoring and Annual Testing: LFG concentrations at perimeter probes, gas collection system headers, the landfill surface, and in ambient air downwind of the landfill shall be monitored once per month or less frequently (but no less than quarterly) as required by the SCAQMD. The LFG collection system shall be adjusted and improved based on quarterly monitoring data and annual stack testing results.

MM-69 LFG flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arresters shall be provided to the satisfaction of the Local Enforcement Agency. To the extent technically and economically feasible, gas recovered at the landfill site shall be converted to energy or developed for other beneficial uses rather than flared.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.6 Biological Resources (City's SEIR Findings for City/County Landfill)

Note that the County's FEIR found that impacts to biological resources, particularly impacts related to the County Significant Ecological Area (SEA), would remain significant and unavoidable even after the incorporation of feasible mitigation measures. Accordingly, the impacts to biological resources identified in the FEIR are discussed in this document in Chapter 6. This subsection addressed only those impacts subsequently identified in the City's SEIR.

Reference: For a complete discussion, see the SEIR Section 4.4 (Biological Resources) and the Addendum Section 3.2.3 (Biota).

5.6.1 Potential Effect: Plants, Wildlife, and Habitat. Development of the proposed Project would disturb existing plant communities, sensitive wildlife species, and habitat that supports sensitive plant or wildlife species.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Twenty-five biological surveys were conducted for the Project site between 1978 and 1996.

2. Over the period, the following plant communities have been identified on the Project site: arroyo willow series (4.8 acres), southern willow scrub (1.9 acres), mulefat scrub (1.5 acres), Coast live oak woodland (45.3 acres), Southern California black walnut woodland (1.9 acres), Venturan coastal sage scrub (160.0 acres), chamise chaparral (9.5 acres), big-cone Douglas fir forest (3.1 acres), and nonnative grassland (19.7 acres). In addition, three other areas comprised of ornamental plantings (9.0 acres), the existing landfill (278.9 acres), and a mitigation area (0.3 acres) are located within the Project site.

3. Ten species of amphibians are associated with the identified on-site habitats. These include five species of newts and salamanders, three species of toads, and two species of tree frogs. Of these, four species were observed, including ensatina (*Ensatina eschscholtzi*), black-bellied slender salamander (*Batrachoseps nigriventris*), western toad (*Bufo boreas*), and Pacific chorus frog (*Pseudacris regilla*).

4. Five species of lizards have been observed on-site, including the western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), and southern alligator lizard (*Gerrhonotus multicarinatus*).

5. Ninety-four bird species have been observed, and an additional 49 species have been identified as potentially occurring in the Project boundaries. Birds commonly observed in the arroyo willow series and southern willow scrub habitats include black phoebe (*Sayornis nigricans*), black-headed grosbeak (*Pheucticus melanocephalus*), bushtit (*Psaltriparus minimus*), lesser goldfinch (*Carduelis psaltria*), Bewick's wren (*Thryomanes bewickii*), song sparrow (*Melospiza melodia*), and house finch (*Carpodacus mexicanus*). The Coast live oak woodland habitat supports a wide diversity of birds, including the western scrub-jay (*Aphelocoma californica*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Picoides nuttallii*), plain titmouse (*Parus inornatus*), and phainopepla (*Phainopepla nitens*). Coastal sage scrub provides habitat for many species, including the California quail (*Callipepla californica*), Bewick's wren, California towhee (*Pipilo crissalis*), and lesser goldfinch. Bird species commonly observed in the chamise chaparral habitat include Anna's hummingbird (*Calypte anna*), western scrub-jay, Bewick's wren, bushtit, wrentit (*Chamaea fasciata*), and spotted towhee (*Pipilo maculatus*). Within the nonnative grasslands, the red-tailed hawk (*Buteo jamaicensis*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), and house finch have been commonly observed. Birds commonly identified in the existing inactive landfill and ornamental planted areas include the rock dove (*Columba livia*), Say's phoebe (*Sayornis saya*), common raven, house finch, lesser goldfinch, Anna's hummingbird, and mourning dove.

6. The following raptor species have been observed on-site: the white-tailed kite (*Elanus leucurus*), Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), red-tailed hawk, golden eagle (*Aquila chrysaetos*), american kestrel (*Falco sparverius*), prairie

falcon (*Falco mexicanus*), and turkey vultures (*Cathartes aura*). In addition, the northern harrier (*Circus cyaneus*) was observed adjacent to the Project site.

7. Seventeen species of mammals have been observed, and 38 additional species are considered to be potentially-occurring. Mammals most commonly observed include the western gray squirrel (*Sciurus griseus*), California ground squirrel (*Spermophilus beecheyi*), Merriam's chipmunk (*TA.M.ias merriam.i*), desert cottontail (*Sylvilagus audubonii*), racoon (*Procyon lotor*), and mule deer (*Odocoileus hemionus*).

8. During field surveys, two sensitive plant species have been located on-site: the Southern California black walnut (*Juglans californica var. californica*) and the slender mariposa lily (*Calochortus catalinae var. gracilus*).

9. Forty-seven sensitive wildlife species are known to occur (or potentially occur) on-site. During field surveys, the following 10 sensitive species have been observed: coastal western whiptail (*Cnemidophorus tigris multiscutatus*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), yellow warbler (*Dendroica petechia*), California horned lark (*Eremophila alpestris actia*), loggerhead shrike (*Lanius ludovicianus*), Cooper's hawk, golden eagle, white-tailed kite, and prairie falcon.

10. Over its lifetime, the proposed Project could impact ±3 acres of arroyo willow series, ±0.3 acre of southern willow scrub, ±31 acres of Coast live oak woodland, ±0.3 acre of black walnut woodland, ±82 acres of Venturan coastal sage scrub, ±5 acres of chamise chaparral, ±3 acres of big-cone Douglas fir trees, ±9 acres of nonnative grasslands, ±0.7 acre of ornamental plantings, ±0.3 acre of mitigation area, and ±125 acres of the existing inactive landfill. The total potential Project impact is ±259 acres.

11. Two populations of slender mariposa lily would have been directly impacted by Project development. However, these populations, which were located within the northern portion of the Project site within City jurisdiction, have been relocated to areas that will not be disturbed by Project development.

12. Development of the Project could potentially disturb suitable habitat for the San Diego horned lizard.

13. Because disturbances would occur to sensitive plant communities, such as the Venturan coastal sage scrub and this habitat is suitable for California gnatcatchers, potential impacts may result. However, no gnatcatchers were observed on-site during the numerous field surveys that have conducted by consulting biologists.

14. Potential breeding habitat for the least Bell's vireo exists on-site within the southern willow scrub and arroyo willow series habitats. This species was not observed during focused field studies conducted by consulting biologists.

15. Potential breeding habitat exists on-site for the western burrowing owls. This species was not observed during field studies by consulting biologists.

16. Potential impacts could occur to native migratory birds and their nests during the breeding season.

17. Project development could result in the removal of active raptor nests.

18. The removal or alteration of wildlife habitats within the Project site would result in the loss of small mammals, reptiles, amphibians, and other animals of slow mobility that live in these habitats, primarily within the proposed development limits of the landfill footprint, ancillary facilities, and related areas. More mobile wildlife species that currently occupy or use the Project site would be forced to move into remaining areas of open space or other habitats, consequently increasing competition for available resources in those areas. This situation could result in the loss of individual wildlife populations that cannot successfully compete.

19. Subsequent to the preparation of the FEIR and SEIR, one wildlife species was listed as threatened or endangered: the California red-legged frog (*Rana aurora draytonii*).

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-70 Venturan Coastal Sage Scrub: A detailed conceptual mitigation plan shall be prepared by the Project Proponent and contain specific information on planting, maintenance, and monitoring. A revegetation plan that includes coastal sage scrub restoration can feasibly occur on-site. The implementation of this plan will provide on-site mitigation greater than 1:1 to offset the loss of coastal sage scrub.

MM-71 Venturan Coastal Sage Scrub: Surface soils and seed sources will be gathered from areas of the Project site and spread within on-site mitigation areas.

MM-72 Slender Mariposa Lily: A conceptual mitigation plan for transplanting relocated lilies was developed by consulting biologists. That plan describes transplantation techniques and monitoring, and it is providing data required by Responsible Agencies during a 5-year monitoring period. As noted above, these lilies have been transplanted.

MM-73 San Diego Horned Lizard: Impacts on the San Diego horned lizard can be mitigated to a level of less than significant by restoring coastal sage scrub habitat. This will create a temporal loss of the species, but the population should recover following restoration of this habitat. Topsoils should be selected that are friable to suit lizard habitat requirements.

MM-74 California Gnatcatcher: Surveys shall be conducted for California gnatcatchers prior to on-site grading to determine the status of this species within development areas. Surveys shall be conducted in accordance with USFWS protocol and, if present, a Section 10(a) permit from the USFWS would be obtained by the Project Proponent. If grading activities occur during the nesting season (i.e. March through July), a federally permitted biologist will survey areas of Project development to determine whether the species is present. If California gnatcatchers are present, on-site grading activities shall cease until USFWS officials are notified. Either additional coastal sage scrub restoration or the purchase of suitable off-site habitat will be required if California gnatcatchers are found on-site.

MM-75 Least Bell's Vireo: Surveys shall be conducted for *least Bell's vireo* prior to on-site grading to determine the status of this species within development areas. Surveys shall be conducted in all areas of potential habitat. If this species is present on-site, a Section 10(a) permit from the USFWS would be obtained by the Project Proponent. If grading

activities occur during the nesting season (i.e. April through July), a biologist will survey areas of Project development to determine if the species is present. If present, on-site grading activities shall cease until USFWS officials are notified.

MM-76 Western Burrowing Owl: Preconstruction surveys shall be conducted by a consulting biologist at least 30 days prior to Project grading to determine if the species is within the County portion of the Project site. If surveys indicate the presence of western burrowing owls, a relocation program shall be implemented.

MM-77 Migratory Bird Treaty Act: To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e. March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.

MM-78 Raptor Nests: If habitat removal is proposed during the raptor breeding season (i.e. March to July), a survey shall be conducted for active nesting areas. If active nests are found, no construction activity shall take place within 500 feet of an active nest until the young have fledged. The 500-foot perimeter around each active nest shall be fenced. Trees containing nests shall only be removed during the non-breeding season.

5.6.2 **Potential Effect: Wetlands.** Stream zones and wetland areas located within the proposed landfill footprint and external to that area (to provide for ancillary facility construction) would be graded, filled, or disturbed as a result of landfilling.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

A stream zone assessment identified the presence of drainage courses, hydrophytic vegetation, and hydric soils (indicating potential Corps jurisdiction) and identified two types of riparian habitat: arroyo willow riparian forest (woodland) and southern willow scrub. The total extent of riparian habitat was approximately ±5.0 acres, and the potential jurisdictional waters of the United States and wetlands totaled approximately 4.20 acres. These riparian habitat jurisdictional waters and wetlands were removed in 2005 during development of the City Landfill.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-79 Potential candidate mitigation sites were identified by the Project Proponent in conjunction with Responsible Agencies for consideration to compensate for impacts on riparian and wetland resources as a result of Project development. These sites include Chatsworth Reservoir, Bull Creek, Bee Canyon and East Canyon, all of which are located proximate to the Project site. Prior to the development of detailed mitigation plans and drawings, the final selection was made collectively by the CDFG, Corps, SWRCB, and other regulatory agencies in conjunction with the City and Project Proponent. Chatsworth Reservoir was chosen as the preferred mitigation site.

MM-80 If that candidate site is ultimately deemed unavailable, the Project Proponent can purchase wetland credit through an established mitigation bank. The Project Proponent would be required to pay an amount established by the mitigation bank developer (i.e. public, non-profit, or private entity) as compensatory mitigation.

MM-81 Under the direction of the Corps, the Project Proponent obtained authorization under Regional General Permit No. 41 for the mechanized removal of invasive, exotic plants (e.g. giant reeds [*Arundo donax*] and salt cedar [*Tamarix spp.*]) from waters of the U.S., including wetlands within the jurisdiction of the Los Angeles District of the Corps.

5.6.3 Potential Effect: Trees. Implementation of the proposed Project would require the removal of only a few native and nonnative trees in the County portion of the Canyon.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Tree assessment reports have been prepared to identify the removal of indigenous oaks and other trees from the County and City portions of the Canyon as a result of Project development. These reports have been prepared by registered professional foresters in consultation with the County Forester and City forest experts, respectively, as the bases for the field evaluations of all trees.

2. In the City portion of the Canyon, 940 oak trees (908 Coast live oak and 32 Canyon live oak) were removed as a result of Project development, as well as 14 Southern California black walnut trees.

3. In the County portion of the Canyon, it is currently estimated that 40 qualifying oak trees will be removed as a result of this approval. Virtually all other trees were removed in the early 1990s for the development of the County Landfill. All trees that must be removed will be fully mitigated on-site

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-82 Native tree species shall be replaced at a 2:1 (replacement: removal) ratio, consisting of 15-gallon or 5:1 3-gallon container trees. Mitigation trees shall be planted prior to impacted trees being removed, thus allowing trees to grow to specimen size in the field. A specimen-size tree shall be defined as a 15-gallon tree with a minimum trunk caliper of 1 inch measured 1 foot above ground. All mitigation trees shall be specimen size within 1 year after tree removal.

MM-83 Nonnative tree species shall be replaced at a 2:1 ratio, consisting of 3-gallon Coast live oak trees.

MM-84 A total of one-hundred 24-inch box and twenty-five 36-inch box size Coast live oak trees shall be planted in areas identified by the City. These trees shall be natural in form. The total mitigation tree count obtained using the 5:1 replacement ratio shall be reduced by 125 trees to account for the inclusion of these larger trees.

MM-85 Mitigation tree planting shall occur within the 100 ± acre open space area located south of the existing inactive landfill. Appropriate planting locations shall be selected within the buffer area based on soil type, steepness of the slope, and aspect (i.e. location and/or direction of the sun).

MM-86 Prior to tree planting, the mitigation site shall be prepped to create an environment favorable for native and nonnative tree growth and survival. The initial step in tree planting is to clear away unwanted grass, weeds, or brush. A minimum 3-foot radius of vegetation shall be cleared around the planting location. All planting holes shall be dug to a minimum depth of 24 inches. If soil conditions cannot accommodate the minimum depth, planting holes shall be relocated to a more suitable location. Trees will be spaced 15 to 20 feet in a random, nongeometric pattern. Row or grid spacing will be avoided to provide a natural look to the mitigation planting.

MM-87 A poultry wire screen with 1-inch-diameter holes shall be installed around the outside wall of the tree planting hole and folded closed on the bottom. The screen shall extend downward to enclose the root ball of the tree that will protrude one foot above final grade.

MM-88 Backfill material shall be used for planting material and shall consist of loose friable soil. The planting shall be backfilled to a depth that allows the root crown of the plant to be even with or slightly higher than the surrounding grade. All planting locations shall be preirrigated to ensure that moisture levels are at or near capacity.

MM-89 Prior to tree planting, all containers shall be thoroughly soaked. Once at the mitigation site, trees shall not be removed from their containers until all site preparation work has been completed. The wire cage shall be installed around the planting hole, and backfill material shall be filled to one-half the depth of the root wod. A 27-gram Agriform fertilizer tablet shall be placed approximately one inch from the root wod. Backfilled soil shall be tamped and soaked to remove any air pockets.

MM-90 Following tree planting, the area shall be mulched with either wood chip or recycled green waste. The mulch shall be applied in an even layer approximately 6 inches or more in thickness.

MM-91 Drip irrigation shall be provided for all planted trees to ensure adequate growth and allow year-round planting. The irrigation system shall include a liquid fertilizer injection system to maintain optimum plant health and growth.

MM-92 The irrigation system shall utilize plastic polyvinyl chloride piping as its main supply lines. Distribution lines shall consist of ½-inch-diameter polyethylene drip tubing. Water shall be delivered to the plants via conventional drip spot emitters. Vortex emitters rated at 1 to 3 gallons per hour shall be used for the emitters. All irrigation water shall be filtered through a "Y" filter containing a 150 mesh screen. The irrigation systems shall be controlled automatically with remote battery-powered controllers and electrical irrigation valves. Watering frequency and duration shall be adjusted as necessary, depending on soil condition, weather, and plant requirements.

MM-93 To assure successful establishment and survival of the mitigation trees, a 3-year monitoring and maintenance program shall be implemented. Each year, the mitigation planting shall be monitored for growth and survival.

MM-94 An annual monitoring report shall be prepared and submitted by the Project Proponent to the County Forester. This report shall detail the growth and survival record for each mitigation tree planted. The report will provide an accounting of the number of trees required for mitigation versus the number of qualifying trees planted. Maintenance recommendations will be included in the annual report.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

5.7 Biological Resources (Vectors)

Reference: For a complete discussion, see FEIR Section 3.2.4 (Biota); SEIR Section 4.4 (Biological Resources); and Addendum Section 3.2.3 (Biota).

5.7.1 Potential Effect: Vectors. The proposed Project has the potential to attract different types of vectors (e.g. rodents, scavenging birds, and insects) to the Project site.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Nonnative species of rodents such as the brown (Norwegian) rat, black (roof) rat, and house mouse are considered to be disease-carrying vectors and can inhabit landfill areas. In addition, common scavenging birds such as pigeons, crows, and sea gulls can be found at landfill facilities. Several species of insects associated with solid waste can be responsible for the spread of disease. Flies are typically associated with landfill areas, and mosquitoes can also pose problems, particularly if standing or slow-moving water exists within the site area. Additionally, the German cockroach, oriental cockroach, brown-banded cockroach, American cockroach, long-tailed silverfish, cat flea, house fly, and the Argentine ant are common pests.

2. Certain types of vectors, such as rodents and insects, can be transported to the site via collection vehicles or self-haul trucks. Generally, the materials contained in curbside collection vehicles are continuously compacted prior to disposal at any facility. The residual solid waste materials from transfer stations/MRFs are also densely compacted into transfer trucks. These trucks are either enclosed or tarped prior to transport. General compaction densities would inhibit vector migration.

3. If a food source is available at the landfill for common scavenging birds such as pigeons, crows, and sea gulls, this could result in food and other wastes being carried to nearby properties, and feathers and excrement being deposited in proximity to the point of origin. Ticks, mites, lice, and fleas associated with the birds could transmit disease to humans.

4. Effective operational and QA/QC procedures would be provided by the Project Proponent to ensure that the proper coverage of landfilled waste materials would be performed on a daily

basis. Similar to the existing County Landfill vector control practices, all waste materials brought to the site would be unloaded at an active working face area, compacted, and covered with at least 9 inches of clean soil by the end of the working day. Approximately 1,400 pounds of compaction per cubic yard would be obtained by the Project Proponent, thus achieving greater refuse density per volume measurement and reducing potential vector impacts from providing a food source or habitation.

5. Many items that would be stored and used at the landfill facilities (e.g. administrative and employee ancillary buildings) have the potential to attract vectors (e.g. food, seed, office supplies).

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-95 The Project Proponent shall monitor the site on a regular basis for vector activity. In addition, the site shall be inspected by the LEA on a regular schedule. Corrective measures shall be immediately taken should a vector problem be detected.

MM-96 Vectors (bird activity) shall be effectively eliminated by stringing wire or monofilament line (15 to 20 pound test) above the active landfill working areas at intervals of 100 to 150 feet, or by other approved means. This disrupts the birds' circling patterns to the extent that they do not attempt to land or congregate to feed on the refuse.

MM-97 Flies shall be controlled at the Project site by a trap-and-destroy program. The use of sprays shall be avoided to the fullest extent possible.

MM-98 Rodent-related problems shall be controlled by operational techniques that are in accordance with recommendations from the LEA, the County Department of Public Health, and CalEPA.

MM-99 Operational techniques shall be utilized to limit vector activity, including compacting waste at the landfill active working face, properly applying cover material; keeping the active working face as small as safely possible given the type and number of landfill equipment, properly grading interim fill surfaces and final fill slopes, and eliminating ponding areas at the Project site.

MM-100 All equipment shall be in good condition and cleaned in a frequency and manner so as to prevent the propagation or attraction of flies, rodents, or other vectors, and the creation of nuisances.

MM-101 Items used at the landfill facility that could attract vectors (e.g. food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and be disposed of if they appear to be an attraction to any vectors.

MM-102 Salvaged materials generated on-site or imported shall be placed away from storage areas, and other activity areas, and limited to a volume approved by the LEA or other approval agencies, minimizing the harborage or attraction of flies, rodents, or other vectors, and the creation of nuisances.

MM-103 All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.

MM-104 If vectors occur on-site, appropriate measures shall be implemented (e.g. the use of a professional exterminator).

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.8 Cultural Resources (Archaeological and Paleontological Resources)

Reference: For a complete discussion of archaeological and paleontological resources, see FEIR Section 3.2.5 (Archaeological, Historical, and Paleontological Resources); Section 4.19.1 (Archaeological Resources) and Section 4.19.2 (Paleontological Resources) of the SEIR; and Section 3.2.4 (Archaeological/Historical/and Paleontological Resources) of the Addendum.

5.8.1 Potential Effect: Archaeological. Site clearance, excavation, and grading activities associated with construction and operation of the proposed Project have the potential to unearth previously undiscovered archaeological resources.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Five archaeological investigations were conducted within Sunshine Canyon between 1975 and 1997. Each investigation included, in part, (1) a records search for information on previous cultural resource surveys performed in or near the Project area, which was conducted at the Archaeological Information Center at the University of California at Los Angeles (UCLA), Institute of Archaeology; and (2) a physical walkover survey of the Project site. The records searches did not identify any other known or recorded archaeological sites within a one-mile radius of the Project Proponent's property.

2. The 1975 archaeological investigation resulted in the discovery and recordation of one prehistoric/historic archaeological site (CA-LAN-816) within the boundaries of Sunshine Canyon. This site was described as a single sandstone bedrock mortar, a scatter of historic material consisting of oriental porcelain and old bottle glass. The site was mapped adjacent to an intermittent watercourse in the southwest corner of Sunshine Canyon. The 1978, 1991, 1994, and 1997 surveys were unable to relocate the site. It was concluded by both Drs. Clewlow and Meighan of the UCLA Institute of Archeology, that the site was of minor importance and that any information provided would be of limited value.

3. The 1994 investigation recorded nine archaeological sites within Sunshine Canyon. Each site was individually numbered (SC-1 through SC-9). SC-1 mitigation was completed by avoidance and fencing off the site. SC-2 was determined not to be of cultural (historical) origin, and no further mitigation was required. Sites SC-3 and SC-9 were fully investigated and reported, in addition to sites SC-4, SC-5/6, SC-7, and SC-8.

4. Landfilling activities are not expected to uncover significant archaeological resources because much of the area has already been disturbed by the previous landfill operations and the activities associated with the quarry and the Cascade Oil Field to the south.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-105 Prior to the commencement of initial earth excavation, specific sections of the Project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered archaeological resources. Specific areas within the Project site to be resurveyed shall be determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include proximity to water, the type of vegetation (e.g. food source, shelter, and fuel), and the topography (e.g. slope and aspect).

MM-106 An archaeologist shall be present on-site during major infrastructure work which requires significant surface disturbance.

MM-107 The Project Proponent shall instruct landfill equipment operators how to identify archaeological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of aboriginal habitation is discovered during earthmoving activities, landfill operations will cease in that particular location until a qualified archaeologist has made a determination as to the significance of the site or findings. Any significant archaeological resources shall be recovered to the extent practicable prior to resuming activities in that area of the landfill.

MM-108 Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports, shall be curated at a regional repository approved by the County.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.8.2 **Potential Effect: Paleontological.** There is a high degree of probability that site clearance, grading, and excavation resulting from construction and operation of the proposed Project will uncover significant paleontological resources.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Sunshine Canyon is located in an area underlain by the late Miocene-early Pliocene Towsley Formation consisting of coarse sandstone and conglomerate, shale, and siltstone. This unit is marine and contains localized bone beds and vertebrate remains of Miocene age. The Towsley Formation is known to contain fossils, primarily in areas adjacent to the site. The

fossils contained in these units (Soledad Embayment) have proven to be of high scientific value. Sparse fossil remains were encountered during a 1989 walkover survey conducted by a qualified paleontologist within Sunshine Canyon. These fossils included pelecypods (clams), gastropods (snails) in the northeastern canyon, and carbonized plant remains in several areas on-site. These resources were not considered significant.

2. Seven fossil localities were identified within the City portion of Project site during the March 1997 field surveys. Although these localities were not identified as containing significant paleontological resources, the Towsley Formation could contain significant fossils adjacent to areas proposed for development.

Based on the analysis presented in the FEIR and SEIR, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-109 Prior to the commencement of initial earth excavation, specific sections of the Project area shall be resurveyed as a precautionary measure to minimize potential loss of undiscovered paleontological resources. Specific sections of the Project area to be resurveyed shall be as determined by the intended cut-and-fill areas proposed for landfill development. As new areas for excavation are identified by the Project Proponent, an evaluation of those areas shall be made based on the prior survey results and consultation with appropriate technical specialists.

MM-110 A paleontologist shall be on-site during major infrastructure work that requires significant excavation. In the event that paleontological resources are discovered during grading or excavation, the paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.

MM-111 The Project Proponent shall instruct landfill equipment operators how to identify paleontological resources and upon discovery of such findings immediately report the location of the site to their supervisor. If any evidence of paleontological resources is discovered during earthmoving activities, landfill operations shall cease in that particular location until a qualified paleontologist has made a determination as to the significance of the findings.

MM-112 Any significant paleontological resources shall be recovered to the extent practicable. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When fossils cannot be removed immediately, the site shall be stabilized to prevent further deterioration prior to data recovery or the fossil location as directed by a professional paleontologist.

MM-113 The paleontologist shall be retained to perform inspection of the excavation and salvage exposed fossils. Collected fossils shall be curated at a public institution with an educational/research interest in the material. Any curation expenses shall be borne by the Project Proponent.

MM-114 For the County side of the landfill, periodic monitoring by a paleontologist will occur when grading takes place in the Miocene-early Pliocene Towsley Formation.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.9 Visual Qualities

Reference: For a complete discussion of visual qualities, see FEIR Section 3.2.10 (Visual); Section 4.8 (Aesthetics/Views) of the SEIR; and Section 3.2.7 (Visual Qualities) of the Addendum.

5.9.1 Potential Effect: New Sources of Light. Development of the proposed Project would result in the addition of new light sources on-site.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Existing sources of light on the Project site are associated with both interior and exterior usage, such as administrative/office structures; the nursery area; security lighting at the landfill entrance, scale house area, certain environmental control systems; and vehicles used for security. Existing light sources do not create or cause a significant impact on motorists or residents because of location and distance from these uses.

2. The proposed Project would require the relocation of several on-site building structures, such as the administrative/general office, the scale house area, and the environmental control center. The relocation and/or the development of new environmental control features, such as the flaring stations and leachate treatment plant, will require lighting for security and maintenance purposes. Therefore, several new light sources would be created on-site. On-site security lighting and security operations would reintroduce both limited night-lighting (stationary) and other associated lighting (vehicle headlights) during nightly security patrols. Because the landfill would only be operational during daytime and early evening hours, a very low level of on-site nighttime illumination is anticipated to be of very limited duration and confined to specific maintenance areas at the Project site.

3. Because the Project site is located within an "Airport Approach Zone," no illuminated or flashing advertising or business sign, billboard or any other structure shall be installed or maintained which would make it difficult for flyers to distinguish between such lights and the aeronautical lights of the airport, or which would result in glare in the eyes of the pilot and impairment of visibility or otherwise endanger the landing, taking off or maneuvering of aircraft.

4. Because of the distance of the on-site light sources from adjoining uses and the low intensity of the light sources, both light and glare created on the Project site would not be visible to surrounding areas. Project lighting would not be visible off-site to area residents during nighttime hours because of the intervening topography and existing ±100 acre open space area that separates the Project site from near-site receptors. Over 10,000 trees have been planted in the buffer zone, and many are over 15 feet tall.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure has been identified and will be incorporated into the Project:

MM-115 All lighting shall be shielded and directed onto the site. No floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public

streets or highways, or pilots within the "Airport Approach Zone." This condition shall not preclude the installation of low-level security lighting.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

5.9.2 **Potential Effect: Visual Character.** Project development would alter the on-site topographic and natural features of the site, changing the visual character and aesthetic quality of the Project site. When landfilling operations are located in the southern portion of Sunshine Canyon, motorists traveling northbound on the I-5 Freeway would have a view of these operations. Landfill operations in the canyon would be visible from the southeast, within areas of Sylmar; and from the westbound lanes of the I-210 Freeway. The proposed Project would also be visible from portions of the upper elevations of the O'Melveny Park hiking/equestrian trail.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The Project site is bordered to the north by undeveloped mountainous terrain in the County, a gun club, worm farm, and horse stables; to the west and southwest by oil fields; to the south by Bee Canyon, O'Melveny Park, and single-family residential uses; and to the east, along San Fernando Road, by a wood chipping and fire wood area, heavy-duty equipment storage, and six trailers. In addition, the Los Angeles Aqueduct Filtration Plant and MWD's Joseph E. Jensen Filtration Plant boundaries are located approximately ½ mile south of the landfill entrance. The Project site is also located near three freeway corridors: the I-5 Freeway directly east of the landfill entrance, the SR-14 Freeway to the northeast, and the I-210 Freeway to the southeast.

2. The most prominent visual features of the Project site include several intervening ridgelines that form the southern, northern, and western perimeter boundaries of Sunshine Canyon. The ridgeline along the western boundary of the Project site rises to an elevation of about 2,150 feet above MSL. The ridgeline that forms the northern boundary of the site has an elevation of about 1,825 feet MSL. The canyon floor descends from a topographic limit (1,850 feet MSL) near the City/County jurisdictional boundary in a southeasterly direction to the mouth of the canyon (1,350 feet MSL) at San Fernando Road. The surrounding topography outside of Sunshine Canyon is dominated by mountainous ridgelines that obstruct and/or limit views into the interior canyon from most adjacent properties and uses.

3. Development of the Project would modify the physical form of the land area as construction occurs to the designated contour elevation of 2,000 feet above mean sea level (MSL) within the City portion of Sunshine Canyon. The final landfill form would result in a small, relatively flat deck, providing a landfill crown area with side slopes tapering down to base-grade elevations in all directions. To the greatest extent feasible, this type of man-made feature would be engineered, constructed, and revegetated (i.e. interim and final) to blend in with natural landform relief of the surrounding mountainous terrain.

4. The Scenic Highways map of the Los Angeles County General Plan designates the SR-14 as a second priority roadway for the enhancement of scenic experiences.

5. Surrounding properties are generally located downgradient and at elevations well below the Project site's ridgelines. North of the site, the topography descends to about 1,000 feet MSL near the I-5 Freeway at Weldon Canyon. Ridges and canyons are located southwest of the site within the O'Melveny Park area. The highest peak and one of the most prominent features in this area is Mission Point at 2,771 feet MSL. This area descends below 1,500 feet MSL within residential areas located south of Bee Canyon Park. The urbanized areas located southeast of the site are well below the 1,300-foot elevation. These elevational differences in topography between the proposed landfill and existing uses would effectively limit potential visual impacts.

6. The existing southern fill limits of the inactive landfill (i.e. larger fill area) range in elevation from 1,725 to 1,950 feet MSL. Elevations in this area would effectively block interior views of the final fill areas from residential uses located to the south and southwest. The highest final fill elevation of the proposed City/County Landfill footprint is 2,000 feet MSL. At this elevation, the top deck area would be higher than the northern perimeter ridgeline, which is 1,825 feet MSL. However, due to the location of the final fill area, which is well within the interior of Sunshine Canyon, exterior perimeter ridgelines would not be visually impacted.

7. Development of the proposed Project would necessitate landform alteration. For example, the landfill footprint would have incremental slope surface areas and/or manufactured benches. The exterior appearance of Sunshine Canyon and its topographic elevations along the southern portion of the Project site would remain unchanged. Project development would not occur within the ±100-acre buffer area, areas along the southern perimeter ridgeline, or within surrounding mitigation sites (i.e., Bee and East Canyons). Associated grading activities and corresponding construction would result in the urbanization of the Project site through the introduction of impervious surfaces and industrial-related development. Development would also result in the loss of indigenous vegetation and the introduction of both native and nonnative plant species.

8. When landfilling operations occur in the southern portion of Project site, motorists traveling northbound on the I-5 Freeway would have a clear view of operational activities for approximately 20 to 30 seconds. The Project area has many industrial uses proximate to the Project site, and motorists using this freeway corridor would view those uses in addition to residential and mountainous terrain. The Project site would also be visible from the SR-14 Freeway at the I-5 interchange. Views would also be limited and similar in duration to those described above. Additionally, affected motorists traveling northbound would have just passed through developed areas located on both sides of the I-5 Freeway within the San Fernando Valley. A brief view of the interior of the canyon would also be provided from Foothill Boulevard. For motorists traveling westbound on the I-210 Freeway, the site is visible from a distance of about 6,000 feet (i.e., greater than one mile). From this distance, motorists would be able to view landfilling operations near the mouth of the canyon for approximately 20 seconds.

9. The landfill is currently visible from limited residential areas in the community of Sylmar. The existing inactive landfill is visible at such a far distance that it is generally indistinguishable from mountainous terrain in the background. Landfill operations would also be visible during final sequencing of the proposed Project from the upper elevations of O'Melveny Park (i.e., hiking and equestrian trails). Along these trails, vegetative screening is provided.

10. Upon closure of the landfill, a final revegetation program would be implemented, and a thick layer of native vegetation consisting of grasses, brush, and trees would be planted to blend in with the surrounding hillside topography, which would eliminate any visual impacts on hiking and equestrian trail users at the O'Melveny Park trail. The proposed Project would not be visible to future users of the proposed County Gavin Canyon Trail because this trail would not be located on Project-Proponent property and would be separated from the Project site by an intervening ridgeline.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been or will be incorporated into the Project:

MM-116 The maximum permitted elevations for the landfill shall not be exceeded by the deposit of waste at any time during landfill development, and they shall be verified through survey control points. Stockpiled soil and final cover soil shall not be subject to this limitation.

MM-117 The cover-material excavation areas shall be confined as much as possible to areas that will later be landfilled.

MM-118 As part of revegetation efforts for the landfill, the upper ridges of the canyon shall be planted with native species (both trees and scrubs) to supplement existing vegetation on the ridgelines and reestablish naturally bare areas.

MM-119 The final cover of landfilled areas shall be landscaped with a ground cover mix and plant species that are compatible with the immediate area and shall be maintained in a natural setting until it is converted to its final use.

MM-120 Pursuant to the 1999 City approval, the ±100-acre open space area on the southern boundary of the Project site shall continue to be maintained and enhanced with both native and nonnative vegetation.

MM-121 The finished elevations for the landfill surface will be maintained well below the closest adjacent abutting or external ownership perimeter ridgeline.

MM-122 Flares will be below the adjacent external perimeter ridges, and the flame will be totally contained within the stack of the flare.

MM-123 Trees will be planted around the outer enclosing ridges of the entire landfill perimeter to further avoid or minimize visibility of the landfill from hiking and riding trail areas.

MM-124 The landfill revegetation measures identified in the conditions of grant and closure plans will be implemented to minimize the overall visibility of the landfill.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.9.3 **Potential Effect: Litter**. Solid waste landfills have the potential to generate litter, which could result in potential nuisance or aesthetic impacts. Because the Project site is located in the eastern edge of the Santa Susana Mountains near the entrance of the Newhall Pass area, wind conditions within this area could potentially transport litter off-site.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Sources of litter associated with operation of a landfill facility include waste materials blown from or dropped by refuse-hauling vehicles en route to a landfill or at the landfill site, waste blown or scattered litter dislodged from the active working face by the wind or the movement of landfill equipment, and unauthorized or illegal dumping.

2. The strongest winds generated within the Santa Susana Mountains are during short-term episodes of "Santa Ana" wind conditions. Santa Ana conditions are prevalent in Southern California during the fall through spring and average approximately 5 to 10 episodes a year.

3. An extensive litter control program with specific preventative and response measures to control windblown litter and debris on-site and, if necessary, within the vicinity of the landfill site is implemented for the proposed Project.

4. A ±100-acre open space buffer zone is located between the proposed landfill working face areas and the nearest residential unit in Granada Hills. In addition, 25-foot-high secondary litter fences would be located along the southern perimeter of the Project boundary to alleviate off-site litter migration.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-125 The landfill site shall be operated to minimize litter generation through implementation of the following measures: compaction of waste at the working face (i.e., 1,400 pounds of compaction per cu. yd.), waste materials covered with at least 6 inches of clean, compacted soil or approved alternative daily cover by the end of the working day, and maintenance of the active working face areas as small as safely possible given the type and quantity of landfill equipment.

MM-126 Litter and debris shall be contained within the landfill property boundaries by the use of secondary litter fences (located along the outside perimeter of the landfill) and by portable litter fences placed adjacent to the active working face areas.

MM-127 The Project Proponent shall inform owners of registered vehicles, by signage, to comply with vehicle tarping requirements under § 23114 and 23115 of the California Vehicle Code. Those waste haulers who repeatedly violate this code shall not be allowed to dispose of their waste loads at the facility or shall be fined until corrective measures are taken.

MM-128 On a regular basis, the Project Proponent shall mobilize cleanup crews to provide litter pickup services within the O'Melveny Park area, along Balboa Boulevard and San Fernando Road, and in other residential areas located in proximity to the landfill, that may be affected by off-site litter migration. On a daily basis, the cleanup crews shall inspect the surrounding area to assess if more frequent cleanups are required.

MM-129 Landfill employees shall watch for any illegal dumping activities on or around the Project site. The landfill litter control crew shall provide cleanup service for areas surrounding the Project site.

MM-130 The administrative offices shall be equipped with a radio dispatch system that can quickly engage crews to respond to perceived litter complaints in the surrounding neighborhoods.

MM-131 The on-site LEA inspector shall inspect the landfill on a regular basis, at which time the effectiveness of the litter control program shall be documented and any necessary improvements shall be made, including the following:

- Landfill personnel shall continuously patrol the access road to the scales from the time the landfill opens until the time of closure in the evening.
- Improperly covered or contained loads that may result in a significant release of litter shall be immediately detained and the condition corrected, if practical, before the load proceeds to the active working face areas. If correction cannot be made, the load shall be conducted under escort to the working face.
- All debris found on or along the landfill entrance and working face access roads shall be immediately removed.
- Operating areas shall be located in wind-shielded portions of the landfill during windy periods.
- Litter fences shall be installed in operating active working face areas, as deemed necessary by the LEA.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.10 Traffic/Access

Reference: For a complete discussion of impacts to traffic and access, see FEIR Section 3.2.8 (Traffic/Circulation); Section 4.13 (Transportation and Circulation) of the SEIR; and Section 3.3.1 (Traffic/Access) of the Addendum.

5.10.1 Potential Effect: Peak Hour Level of Service. With the addition of Project-generated traffic, six key intersections will experience "significant" volume-to-capacity increases during the A.M./P.M. peak hours.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. A 1993 traffic analysis was prepared as part of the FEIR. Subsequently, a 1995 traffic study was prepared to analyze the traffic impacts associated with implementation of a combined

City/County Landfill. At the request of the County Board of Supervisors, a 2004 Supplemental Traffic Data Report (STDR) was prepared under the direction of the County of Los Angeles Department of Public Works as part of the Addendum to the FEIR and SEIR.

2. Regional access to the Project site from waste-hauling vehicles is provided via the following freeway systems: Antelope Valley (SR-14), Foothill (I-210), Simi Valley-San Fernando Valley (SR-118), Golden State (I-5), and San Diego (I-405) Freeways.

3. The transportation system that may be affected by the proposed Project includes both existing local roadways and freeway systems. The following 13 key intersections were identified by the City of Los Angeles Department of Transportation (LADOT) as the locations that have the potential to be impacted by the proposed Project and analyzed in the traffic impact study report: (1) Roxford Street at the I-5 Freeway (southbound [SB] offramp); (2) Roxford Street at the Encinitas Avenue/and the I-5 Freeway (northbound [NB] offramp); (3) Roxford Street at the I-5 Freeway (NB offramp); (4) Roxford Street at San Fernando Road; (5) San Fernando Road at Sepulveda Boulevard; (6) San Fernando Road at Balboa Boulevard; (7) San Fernando Road at the I-5 Freeway (SB offramp); (8) San Fernando Road at Sierra Highway; (9) San Fernando Road at Project Driveway; (10) Foothill Boulevard at Sierra Highway; (11) Yarnell Street at Foothill Boulevard; (12) Yarnell Street at the I-210 (eastbound [EB] offramp); and (13) Yarnell Street at the I-210 (westbound [WB] offramp).

4. San Fernando Road is classified as a major highway. This is a four-lane roadway (two travel lanes in each north/south direction) with a posted speed limit of 45 miles per hour (mph). Near the landfill entrance, San Fernando Road is located west of and generally parallel to the I-5 Freeway. North of the SR-14 Freeway, San Fernando Road continues as the Old Road.

5. Sepulveda Boulevard is classified as a major highway and is located south of the Project site between San Fernando Road and Roxford Street. Sepulveda Boulevard [generally] has a north/south alignment, with one travel lane in each direction and a posted speed limit of 45 mph.

6. Roxford Street is classified as a major highway and has one travel lane in each direction between Encinitas Avenue and San Fernando Road; however, two through lanes and a left-turn lane are provided on Roxford Street at these two intersections. The posted speed limit on Roxford Street is 35 mph. Access to and from the I-5 Freeway is provided via Roxford Street.

7. Balboa Boulevard is classified as a major highway and extends south from Foothill Boulevard, crosses over the I-5 Freeway and San Fernando Road, then continues south into the City. A connector road provides access between Balboa Boulevard and San Fernando Road. Balboa Boulevard restricts truck traffic in excess of 6,000 pounds south of San Fernando. Balboa Boulevard has two to three lanes in each direction and provides a two-way directional left-turn lane between San Fernando Boulevard and Rinaldi Street. Balboa Boulevard, located less than 2 miles west of the I-405 Freeway, provides an alternative north/south route that generally parallels the I-405 Freeway.

8. Foothill Boulevard is classified as a major highway with an east/west alignment and is located south of the I-210 Freeway. This roadway extends underneath the I-210 Freeway and parallels the I-5 Freeway northeast of that freeway. Between Sierra Highway and Yarnell Street, Foothill Boulevard includes one travel lane in each direction.

9. Yarnell Street is classified as a major highway and is a four-lane roadway located near the I-210 Freeway. EB and WB onramps and offramps are provided to that freeway. South of Foothill Boulevard, Yarnell Street continues as a two-lane roadway.

10. Under traffic conditions in the year 2002, the following intersections operated at unacceptable levels of service (LOS E or F) during the A.M. and/or PM peak hours:

    - Roxford Street at the I-5 Freeway (SB onramp) operated at LOS F during the A.M. peak hours, and LOS E during the PM peak hours;
    - Roxford Street at Encinitals/I-5 Freeway (NB onramp) operated at LOS E during A.M. peak hours;
    - Roxford Street at I-5 Freeway (NB offramp) operated at LOS F during A.M. peak hours;
    - San Fernando Road at Balboa Boulevard operated at LOS F at both A.M. and P.M. peak hours;
    - San Fernando Road at Sierra Highway operated at LOS F during A.M. peak hours and LOS E during PM peak hours;
    - San Fernando Road at Sunshine Canyon operated at LOS F during A.M. peak hours; and
    - Foothill Boulevard at Sierra Highway operated at LOS F during A.M. peak hours.

    The remaining key intersections all operated at LOS D or better.

11. A comparison of 1995 traffic volumes and traffic count data collected in 2002 indicated that traffic entering and exiting the Project study area from the north via Sierra Highway and San Fernando Road had increased, especially during the A.M. peak period. This caused A.M. peak hour LOS to degrade significantly along several key intersections.

12. The primary sources of truck traffic into and out of the landfill facility are transfer trucks and smaller residential collection vehicles. The 1995 traffic study assumed that approximately 46.4 percent of the total daily waste intake into the facility would originate from transfer stations and 51.8 percent would originate from curb-side collection trucks. The 2004 STDR reviewed current Material Activity Reports and determined that approximately 47.7 percent of the actual total daily waste intake into the facility in 2002 originated from transfer stations and 49.7 percent originated from curb-side collection trucks. Thus, in actuality, a greater proportion of transfer trucks to curbside collection trucks deliver waste to the landfill than was estimated in the 1995 traffic study.

13. Transfer trucks are typically 60 feet long and can accommodate a waste capacity of approximately 23.5 tons. One transfer truck is assumed to be equivalent to 3 passenger cars (PCE).

14. Typical curbside collection trucks are 40 feet long and accommodate a capacity of 9 tons. One curbside collection truck is assumed to be 2 PCE.

15. The remaining source of transport originates from local deliveries (e.g. landscapers, gardeners). Approximately 171.6 tpd (or 2.6 percent of the maximum daily intake) of the daily waste intake would be transported by these types of vehicles.

16. The 1995 traffic study assumed that during the A.M. peak hour, 55 percent of the Project-specific traffic would be inbound and 45 percent outbound; during the P.M. peak hour, the split between inbound and outbound is reversed (i.e. 45 percent inbound, 55 percent

outbound). Based on these factors, the 1995 traffic study forecast that the proposed Project (within the City jurisdiction) would generate 245 PCE trips (i.e. 139 inbound, 106 outbound) during the A.M. peak hour and 285 PCE trips (i.e. 123 inbound, 162 outbound) during the P.M. peak hour.

17. Based on actual trip rates developed from the existing County side of the landfill in 2002, the 2004 traffic study projected that the proposed Project (within the City jurisdiction) would generate 245 PCE trips (i.e. 121 inbound, 124 outbound) during the A.M. peak hour and 74 PCE trips (i.e. 24 inbound, 50 outbound) during the P.M. peak hour.

18. Comparison of the existing trip generation at the County landfill with the projections in the 1995 traffic study shows that the traffic impact of the County portion of the landfill was significantly overestimated.

19. The 1995 traffic study identified 33 related projects that were expected to generate a total of 68,320 daily trips (converted to PCEs). Of these trips, an estimated 5,390 total trips (3,365 inbound, 2,025 outbound) were forecasted to occur during the A.M. peak hour, and 7,570 total trips (3,115 inbound, 4,455 outbound) during the P.M. peak hour.

20. The 2004 STDR found that 14 of the identified 33 projects were built and occupied, 2 were partially occupied, and 17 had not been constructed. Of the 17 that had not been constructed, 2 were withdrawn: the Towsley Canyon Landfill and the Elsmere Canyon Landfill. These 2 related projects were identified as generating daily 10,500 PCE trips, which made these 2 projects the greatest generators of traffic among the related projects. They were each forecasted to generate 1,120 trips during the A.M. peak period and 1,320 trips during the P.M. peak period.

21. The 2004 STDR included a single additional-related project that was not considered in the 1995 traffic study. The new related project is a fast-food restaurant forecast to generate a total of 1,710 daily trips, with 117 trips during the A.M. peak period and 79 trips during the P.M. peak period. Even with the addition of 1,710 trips from the fast food restaurant, the loss of 10,500 trips from the Towsley Canyon Landfill and 10,500 trips from the Elsmere Canyon Landfill results in a net reduction in the number of trips that would be generated by related projects.

22. Both the 1995 traffic study and the 2004 STDR found that with the addition of cumulative traffic, significant impacts on traffic conditions would occur at the following five key intersections:

    - Roxford Street at the I-5 Freeway (SB ramp)
    - Roxford Street at Encinitas/I-NB Ramps
    - San Fernando Road at Balboa Boulevard
    - San Fernando Road at Sierra Highway
    - San Fernando Road at Sunshine Canyon Landfill.

23. In addition, the 2004 STDR found an additional significant impact at Roxford Street at the I-5 Freeway (NB ramp).

24. Potential traffic impacts at three Congestion Management Program (CMP) freeway monitoring stations along the Golden State Freeway (I-5) and one monitoring station located

along the San Diego Freeway (I-405) were reviewed by the traffic consultant in 1995 and again in 2004. Because A.M./P.M. peak-hour Project-generated trips are below the threshold of 150 or more trips required for the freeway segment analysis, no additional analysis was performed.

25. The 2004 STDR in consultation with CalTrans and LADOT resulted in the refined and substitute mitigation measures from those identified in the 1995 traffic study. In addition, the 2004 STDR called for the following voluntary improvements:

    - Roxford Street at I-5 SB Off-ramp. Prior to operating under the subject approval, the westbound approach on Roxford Street should be re-striped to provide dual left-turn lanes and one through lane. (MRMP Mitigation Measure No. 136).
    - Roxford Street at the Encinitas/I-5 NB Off-ramp. The Project Proponent is to re-stripe the northbound approach on Encinitas Avenue to provide a left-turn lane, a shared through/left-turn lane, and a shared through/right-turn lane. (MRMP MM N. 137).

    Additionally, as a voluntary improvement, the Project Proponent agreed to voluntarily convert the southbound option left/through/right-turn lane of this two-lane, northbound "loop" off-ramp to a through/right-turn lane, thereby eliminating the left-turn option for this shared lane. Furthermore, it was determined that the I-5 NB "direct" off-ramp should be re-striped and re-signed from one shared left/right-turn lane and a right-turn lane to two exclusive right-turn lanes. However, the use of this "direct" off-ramp by trucks was not allowed. Instead, trucks have been required to use the I-5 northbound/Roxford "loop" off-ramp.

26. At the time of preparation of these findings, all voluntary improvements and mitigation measures identified in the 2004 STDR and set forth herein have been constructed.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been or will be incorporated into the Project:

MM-132 San Fernando Road and Balboa Boulevard. Under the City's approval, the Project Proponent was to contribute, in a "fair share" amount determined by LADOT, to the design, construction, and operation of the Northeast Valley Automated Traffic Surveillance and Control (ATSAC) System for the intersection of San Fernando Road and Balboa Boulevard. (MRMP MM No. 139). However, the Northeast Valley ATSAC System is no longer in existence and has been replaced by various systems. The intersection of San Fernando Road and Balboa Boulevard is now part of the San Diego Freeway Corridor Phase I ATSAC System, which is currently under construction. Therefore, LADOT required Project Proponent to fund this current design and construction, and the Project Proponent made an ATSAC System Fee payment of $114,591 on June 13, 2003.

MM-133 San Fernando Road at Sierra Highway. Under the City's approval, the Project Proponent was to re-stripe the northbound approach of San Fernando Road, provide a shared through/right-turn lane and exclusive right-turn lane, and re-stripe the westbound approach of Sierra Highway for a 12-foot wide curb lane. (MRMP MM No. 140). However, LADOT determined that in lieu of this mitigation measure, Project Proponent should fund the design and construction of a traffic signal at Sierra Highway and San Fernando Road and the re-striping of Sierra Highway to create a separate left-turn lane

and shared left/right-turn lane on the westbound approach of Sierra Highway; and this mitigation measure has been completed.

MM-134 San Fernando Road at Landfill Project Driveway. In accordance with City MRMP MM No. 141, the Project Proponent has installed a new traffic signal at San Fernando Road/Project Driveway and has widened and re-striped the northbound approach of San Fernando Road to provide a left-turn lane and a through lane (two northbound lanes currently exist); and the Project Proponent has contributed $114,591 to the design, construction, and operation of the San Diego Freeway Corridor Phase I ATSAC System for this intersection.

MM-135 Bonding of Improvements. The City required that any street improvements and signal modifications not completed to date, as set forth above, be guaranteed by the Project Proponent through the bonding process of the City Bureau of Engineering and, where applicable, the encroachment permit process of Caltrans before issuance of any certificate of occupancy. In this regard, prior to setting the bond amount, the City Bureau of Engineering met with the Project Proponent to finalize the proposed geometric and traffic signal designs for the Project; and the Project Proponent has filed a bond in the amount of $200,000. (MRMP MM No. 142).

MM-136 Parking and Safety on San Fernando Road at Sierra Highway. Parking and Safety concerns were addressed by the Project Proponent's installation of a new traffic signal at San Fernando Road/Project Driveway, widening and re-striping of the northbound approach at San Fernando Road to provide a left-turn lane and a through lane, and the contribution of $114,591 to the design, construction, and operation of the San Diego Freeway Corridor Phase I ATSAC for this intersection. (MRMP MM No. 143).

MM-137 Divert Trips. The Project Proponent has implemented a program to avert wasted trips to the landfill and illegal disposal when the landfill meets its weekly and/or daily maximum limit The program includes:

- Scheduling of regular users, such as commercial and municipal haulers, to avoid their arriving at the landfill and being diverted to other landfills;
- Reservation of capacity for small commercial and private users, unless an alternative landfill or transfer station located within 5 miles of the Project Proponent's landfill is available to accept such users.

MM-138 San Fernando Road at the Base of the I-5 Off-ramp. Although not required by the SEIR, the 1999 City approval called for the Project Proponent to install a traffic signal on San Fernando Road at the base of the Golden State Freeway (I-5) off-ramp, to the satisfaction of Caltrans, LADOT, and City Engineering, and to contribute to the design, construction, and operation of an appropriate ATSAC system for this intersection. Caltrans later determined, however, that this measure is not appropriate at this location under the current circumstances. Therefore, LADOT determined that in lieu of this mitigation, the Project Proponent should provide $125,000 to fund the construction of such a traffic signal if and when it is pursued by LADOT in conjunction with future improvements along San Fernando Road; and the Project Proponent made the $125,000 payment on July 15, 2004.

MM-139 Street lights were installed along the property's frontage along San Fernando Road to the satisfaction of the City Bureau of Street Lighting.

MM-140 If deemed necessary by LADOT, a speed zoning survey will be conducted to determine the need to post reduced speed signs on San Fernando Road near the landfill entrance.

5.10.2 Potential Effect: Safety. The Proposed Project would generate additional truck traffic along San Fernando Road, resulting in potential circulation safety problems at the landfill entrance.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. As part of the traffic study conducted for the Sunshine Canyon Landfill Extension FEIR, a safety analysis was performed in order to determine the potential circulation safety problems associated with truck traffic accessing the landfill entrance via San Fernando Road. In addition to a record search consisting of a computerized retrieval of traffic accident records (from 1982 through 1987), field observations were made at the landfill entrance to determine the topography and geometrics of that intersection.

2. The record search performed included information for the following intersections: I-5 Freeway and San Fernando Road, San Fernando Road and Sepulveda Boulevard, Roxford Street and San Fernando Road, and Balboa Boulevard and San Fernando Road. The findings of this search indicated that no unusual safety problems existed at or near the landfill entrance or at these key intersections. At that time, field observations by the traffic consultant disclosed that due to the topography, narrow roadway, and adverse curvilinear alignment of San Fernando Road, the impression is perceived as a less-than-desirable section of roadway. However, the accident record statistics developed by LADOT at this time did not support this impression.

3. The County Landfill began operation in August 1996. Prior to that time, certain improvements to San Fernando Road were implemented by the City and the Project Proponent, including new surface paving, restriping, curb and gutter replacement, and roadway realignment. Additional landfill entrance and roadway improvements for the County Landfill Project were made during the summer of 1996.

4. Field observations of all key intersections were performed as part of the traffic impact report for the proposed Project. These observations revealed that existing pavement conditions and signs of pavement deterioration were not evident. Visual observations indicate that potential vehicle safety hazards, such as pavement cracking, potholes in the roadways, and signs of roadway sags or humps, are not apparent. Because these observations indicate that overall conditions at these intersections are good, potential accident risks and safety hazards due to physical conditions are not expected to occur.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-141 Queuing space for up to 130 trucks has been provided to preclude the necessity for on-street parking prior to the morning opening of the landfill.

MM-142 The Project Proponent has posted a notice at the entrance to the site, provided handouts, and maintained regular monitoring to discourage parking of commercial trucks along San Fernando Road. Regulatory agencies will be notified by the Project Proponent if parking enforcement is necessary. Weigh scales have been installed at the landfill. The Project Proponent will charge differential tipping fees if necessary to discourage trucking of partially filled loads to the landfill.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.10.3 **Potential Effect: Bicycles.** The proposed Project would generate additional truck traffic along San Fernando Road, potentially increasing bicycle/truck incidents.

Findings: The County hereby finds that changes or alterations have been required in (or incorporated into) the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The Bicycle Plan, a part of the Transportation Element of the City's General Plan, depicts a Class II bicycle lane designation along San Fernando Road, Sesnon Boulevard, Balboa Boulevard, and Roxford Street.

2. A narrow shoulder area along San Fernando Road has been developed to a Class II bicycle lane standard.

3. No significant accidents have occurred between landfill vehicles and bicyclists.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-143 Signage. Signage has been installed at the entrance to the Sunshine Canyon Landfill and along San Fernando Road. These signs caution the public that heavy truck traffic exists in the area. This satisfies MRMP MM No. 144.

MM-144 Bicycle Routes. Mitigation measures have been implemented to address any potential localized impact along the San Fernando Road bicycle lane from increased truck traffic at or near the Project site.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.11 Education

Reference: For a complete discussion of impacts to traffic and access, see Section 4.14.3 (Schools) and Section 4.14.6 (Libraries) of the SEIR and Section 3.3.3 (Education) of the Addendum.

5.11.1 **Potential Effect: New Students**. Project development would result in additional jobs that may generate the formation of additional households and students within the Los Angeles Unified School District's (LAUSD) attendance boundaries.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Within the Granada Hills-Knollwood CPA, eight elementary schools, three middle schools, and two high schools are operated by the LAUSD. The nearest school to the Project site is Van Gogh Elementary (approximately 1¾ miles from the landfill entrance or 1.0 mile from the nearest point of the Project). This school site is currently closed due to seismic retrofitting and reconstruction. Other schools near the Project site include El Oro Way Elementary, Frost Middle School, and Kennedy High School. All schools have available student capacity.

2. Approximately eight new students (based on a generation rate of 0.498 household per worker and 0.45 student per household for grades K-12 referenced in the Los Angeles Unified School District School Facilities Fee Plan) would be generated by the proposed Project. These additional students could be readily accommodated at nearby schools.

3. LAUSD imposes school development impact fees as allowed under State law (California Government Code, § 65995[b]) for the purpose of constructing new classroom facilities. These fees are collected prior to the issuance of a building permit and are based on the applicable floor area of building square footage multiplied by the current fee assessment.

4. Development of the proposed Project would require the relocation of ancillary structures (administration building, caretaker trailer, control center, lunchroom/locker room, and scale house) from the County onto lands within the City. These structures, which are all portable trailers (except for the control center), would serve the combined County/City Landfill.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure has been identified and has been (or will be) incorporated into the Project:

MM-145 Prior to the issuance of an occupancy permit for the City Landfill, the Project Proponent submitted proof to the City's Department of Building and Safety that all applicable school impact fees had been paid.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.12 Fire Services

Reference: For a complete discussion of fire and emergency medical services, see Section 3.2.12 (Fire Service) of the FEIR; Section 4.9.4 (Employee Safety and Security), Section 4.9.6 (Risk of Explosion), and Section 4.14.1 (Fire and Emergency Medical Services) of the SEIR; and Section 3.3.4 (Fire/Sheriff) of the Addendum.

5.12.1 Potential Effect: Increase Demand for Services. Development of the proposed Project would introduce additional workers and structures within a high-fire hazard area, thereby potentially placing greater demands on existing fire protection and paramedic resources.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency services for the City. Fire protection and paramedic services are provided to the Project site (City portion) by the LAFD. LAFD Fire Station No. 18 is located at 12050 Balboa Boulevard, approximately 2½ miles from the Project site. This is the jurisdictional engine company for the Project area and has an anticipated response time of under 10 minutes. Personnel includes one district emergency medical services captain, one captain, one engineer, and two firefighters.

2. Fire protection and paramedic service serving the County is provided by the Los Angeles County Fire Department (LACFD). Station 124 is the jurisdictional engine company located at 25111 Pico Canyon Road, Valencia. Its staffing and equipment levels include a paramedic rescue squad (two firefighters/paramedics) and an engine company (one captain, one engineer, and one firefighter). This station is approximately 6 miles from the site and has an estimated response time of 4 to 5 minutes.

4. The LAFD requires that the Project Proponent illustrate on a plot plan existing streets and roadways that provide access to the Project site. Information includes road widths, centerline radii, grades, road improvements, distance to nearest fire hydrants, the precise locations of on-site hydrants and turnouts, the location of and distance to the nearest fire station and equipment available, and the identification of the water purveyor.

5. The Project site is located in a Very High Fire Hazard Severity Zone. There is a potential for extremely hazardous brush fires to occur within this zone. The high degree of fire hazard is due to the highly flammable native vegetation, steep terrain, and dry and windy climate conditions (i.e. Santa Ana winds). Development requirements within this zone include hillside brush clearance, fire access roads, and fire-resistant construction and landscaping materials.

6. The Project site is primarily disturbed from landfilling activities that have occurred over a nearly 50-year period. However, much of the surrounding property is undeveloped and has the potential to create an extreme fire hazard condition. The access road and landfill serve as a partial firebreak from surrounding brush areas.

7. Small on-site brush fires would be controlled by using landfill equipment such as tracked dozers, scrapers, and water trucks. Control of off-site brush fires would be the responsibility of either the LAFD or LACFD. However, landfill equipment would be made available to these departments during off-site brush fires. If necessary, the inactive landfill top plateau could be used as a staging area for either LAFD or LACFD helicopters making water drops to combat off-site brush fires. In the event that a brush fire encroaches onto the Project site, landfill operations would immediately cease until either the LAFD or LACFD is notified. However, tracked dozers would be mobilized immediately by landfill personnel to create firebreaks.

8. Existing on-site water distribution and storage facilities include a 100,000-gallon water tank within the City portion and 265,000-gallon water tank and three fire hydrants within the

County portion to meet fire flow demands. Existing water lines distribute water throughout the Project site.

9. A Fire Response Plan has been prepared for landfill personnel. This plan details procedures to follow in the event of a fire or explosion, designates an emergency coordinator, and establishes safe havens for employees. All landfill personnel are trained where the nearest fire extinguishers are located, how to extinguish small fires, and who to contact in case of an emergency.

10. For trauma care, the closest hospital facility to the Project site is Holy Cross Medical Center. This center is located at 15031 Rinaldi Street within the community of Mission Hills, approximately 5½ miles from the Project site. Response time by ambulance to the site is approximately 10 to 12 minutes.

11. Emergency care is also provided via helicopter ("air ambulance") transport. An air ambulance is stationed at the Van Nuys Airport. Total transportation time for an air ambulance to arrive at the Project site and transport a victim to Holy Cross Medical Center is 15 to 17 minutes. Helicopters are also used by the LAFD and LACFD for making water drops during fire fighting operations on brush and grass fires, fire prevention, prefire planning, and high-hazard fire patrol.

12. Fire flow requirements have been set by the LACFD.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-146 On-site water trucks shall provide sufficient water storage and pumping capabilities to extinguish fires. Tracked dozers and scrapers shall be utilized to smother any on-site fires. Easily accessible soil stockpile areas for daily cover shall be used by landfill personnel to smother on-site fires.

MM-147 The Project Proponent shall maintain and expand existing on-site fire response capabilities by using heavy operating equipment and readily available fire-extinguishing equipment. A 200-foot long, 1½-inch-diameter fire hose shall be available on water trucks for firefighting at the landfill working face area. If necessary, earthmoving equipment shall be used to control fires by smothering fires with dirt.

MM-148 No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

MM-149 Construction of the realigned access roadway shall not exceed 15 percent in grade. An access road shall be constructed and maintained around the working area of the landfill for emergency access for fire fighting equipment.

MM-150 The Project Proponent shall temporarily close the landfill if a fire of regional significance is located near the Project area and poses an imminent threat to the safety of landfill employees.

MM-151 All internal combustion engines used in landfilling operations shall be equipped with spark arresters.

MM-152 Landfill equipment shall be cleaned regularly to reduce the potential for equipment fires.

MM-153 Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulics, and fuel lines.

MM-154 The Project Proponent shall maintain brush clearance measures consistent with the permit requirements of the County of Los Angeles and other applicable codes.

MM-155 The landfill shall comply with all applicable code and ordinance requirements for fire access, water mains, fire flows and fire hydrants as specifically defined by the LACFD.

MM-156 New construction of water tanks, water mains and fire hydrants shall meet the fire-flow requirements of LACFD and shall be completed prior to the commencement of joint landfilling operations.

MM-157 All fuel storage tanks used on-site shall be installed under permit with the County of Los Angeles Fire Marshal, and storage and containment facilities will be installed in accordance with LACFD, RWQCB and other applicable regulations. Labeling and reporting of motor fuel storage will comply with provisions of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986.

MM-158 Definitive plans and specifications shall be submitted to the LACFD and requirements for necessary permits satisfied prior to commencement of landfill development.

MM-159 The Project Proponent shall maintain brush clearance within 100 feet of landfill operations and structures. Fire-resistant native plants shall be maintained free of combustible litter (i.e. partly decayed/organic matter). These plants shall be used without restriction within this brush clearance zone.

MM-160 Fire breaks, roads, and fire trails shall be maintained by the Project Proponent.

MM-161 Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain LACFD access.

MM-162 Access for LACFD apparatus and personnel to and into all structures shall be required.

MM-163 A detailed fire response plan shall be prepared by the Project Proponent that incorporates LACFD requirements.

MM-164 Fire extinguishers shall be maintained in all heavy equipment, on-site work vehicles, and all structures.

MM-165 Signs shall be posted on-site and in a manner approved by the LACFD prohibiting open burning within the Project area.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.12.2 **Potential Effect: Workplace Accidents**. The proposed Project has the potential to result in serious workplace accidents due to the movement of heavy equipment and refuse vehicles, exposure of workers to hazardous substances, potential fire hazards, and accidents to workers performing maintenance or repair work on heavy machinery.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Based on existing State law, every California employer must establish, implement, and maintain a written injury and illness prevention (IIP) program. A copy of that program must be maintained at each workplace or at a central worksite if the employer maintains nonfixed worksites. The requirements for establishing, implementing, and maintaining an IIP program consist of the following eight elements: (1) responsibility, (2) compliance, (3) communication, (4) hazard assessment, (5) accident and exposure investigation, (6) hazard correction, (7) training and instruction, and (8) recordkeeping.

2. The Project Proponent shall ensure that emergency medical services would be available for all Project employees. In addition, the Project Proponent shall ensure the availability of a suitable number of appropriately trained persons to render first aid and readily available first-aid kits shall be provided.

3. The Project Proponent shall inform all employees of the procedures to follow in case of injury or illness. Proper equipment for the prompt transportation of the injured or ill person to a physician or hospital where emergency care is provided, or an effective communication system for contacting hospitals or other emergency medical facilities, physicians, ambulance, and fire services, shall be provided.

4. Procedures for investigating workplace accidents and hazardous substance exposures would be implemented by landfill management personnel. These procedures would include the following: (1) visiting the accident scene as soon as possible and interviewing injured workers and witnesses, (2) examining the workplace for factors associated with the accident/exposure, (3) determining the cause of the accident/exposure, (4) taking corrective action to prevent the accident/exposure from reoccurring, and (5) recording the findings and corrective actions taken. Any unsafe or unhealthy work conditions, practices, or procedures are required to be corrected by the landfill site manager or supervisor in a timely manner dependent on the severity of the hazard.

5. Employees would inform refuse haulers (if necessary) at the scale house area of the procedures for unloading solid waste materials. Flaggers shall be used on-site where barricades and warning signs cannot control the moving traffic. Flaggers shall be trained in the proper fundamentals of flagging moving traffic.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-166 All landfill equipment shall be properly maintained and operated to minimize the health and safety impacts on landfill personnel and the public. Standby equipment shall be made available during periods of vehicle maintenance or breakdown.

MM-167 The landfill operator shall implement an IIP program in compliance with CCR, Title 8, § 3203, designed to protect employees from work-related hazards associated with

operation of the landfill site. Unsafe or unhealthful work conditions, practices, or procedures shall be immediately corrected by the landfill operator.

MM-168 Each supervisor or manager shall conduct regular periodic inspections to identify less-than-adequate or unsafe working conditions, improper or unsafe work practices, or procedures in their work areas. The maintenance supervisor shall be notified of needed repairs or corrective measures using a "safety inspection report" form. Additional inspections shall be accomplished whenever new processes, procedures, substances, or equipment are introduced into the workplace or when a supervisor becomes aware of a new, potential, or previously unrecognized hazard.

MM-169 Appropriate inspection checklists shall be developed, used, and maintained to accurately reflect various exposures in different work areas. Daily observation of the workplace environment by employees, supervisors, managers, and the safety director shall occur. Discrepancies shall be reported. Records of inspections, deficiencies, and corrective measures shall be maintained in the safety/maintenance offices.

MM-170 If a problem or discrepancy is identified, an inspection report shall be prepared. The report shall identify the priority assigned to each discrepancy, as follows: Priority One, resolve the problem immediately; Priority Two, resolve the problem by the end of the working day; Priority Three, resolve the problem within 48 to 72 hours; and Priority Four, resolve the problem within 1 week as soon as the part(s) and/or materials are available. Unsafe work practices shall be interrupted immediately by the observing supervisor. Appropriate training shall be implemented. If the unsafe practice continues, progressive discipline shall be employed.

MM-171 Communication of safety and health methods to employees shall include verbal communication with employees at quarterly safety meetings; small group meetings conducted by first-line supervisors with their respective employee groups that shall be weekly "tailgate," "toolbox," or operations and safety meetings; written safety and health issues posted on employee bulletin boards; safety posters; suggestion boxes for employees to anonymously utilize; and action by management to evaluate and implement the pertinent employee safety suggestions.

MM-172 Accident/injury reports, inspections, and findings, including corrections and training records, shall be kept for 3 years. The OSHA Log 200 shall be retained by the Project Proponent for a period of 5 years. Medical records for those employees involved in handling of hazardous wastes shall be maintained for a period of 30 years after employment termination.

MM-173 First-aid kits shall be located in dispatch, maintenance, scale houses, and corporate administrative offices, in addition to all supervisor vehicles. These kits shall contain "Band-Aids," bandages, sprays, miscellaneous ointments, and minor treatment supplies. These supplies are intended for treatment of small or nonserious cuts, burns, scrapes, etc. Injuries requiring medical attention shall be treated at the Holy Cross Medical Center. This hospital shall also provide ambulance service.

MM-174 The Project Proponent shall implement an emergency action plan in compliance with CCR, Title 8, § 3220. This plan shall designate emergency escape routes and procedures, rescue and medical duties, methods for reporting fires and other emergencies; and names of persons and departments to contact during an emergency.

MM-175 The Project Proponent shall implement a fire prevention plan in compliance with CCR, Title 8, § 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e. welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.

MM-176 In compliance with CCR, Title 8, § 3314, lockout/blockout procedures shall be implemented at the proposed Project. Machinery or equipment capable of movement shall be stopped and the power source deenergized or disengaged; if necessary, the moveable parts shall be mechanically blocked or locked out to prevent inadvertent movement during cleaning, servicing, or adjusting operations. If the machinery or equipment must be capable of movement during this period in order to perform the specific task, the Project Proponent shall minimize the hazard of movement by providing and requiring the use of extension tools or other methods to protect employees from injury. Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or positively sealed in the "off" position during repair work and setting-up operations. The operator shall provide a sufficient number of accident prevention signs or tags and padlocks, seals, or other similarly effective means to safely conduct repairs.

MM-177 Personal protective equipment shall be provided to all operations employees and will include hard hats, heavy gloves, ear plugs, dust masks, safety boots, goggles, and safety vests.

MM-178 The Project Proponent shall comply with all applicable safety ordinances contained in the County Code.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.12.3 Potential Effect: Gas Explosion. Landfill employees working within trenches and excavations have the potential to be exposed to methane gas from the pre-existing inactive portion of the City Landfill, or from naturally occurring hydrogen sulfide gases found in areas of former oil-drilling operations.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following fact and related mitigation measure are presented in support of these findings:

Workers shall not be permitted to enter trenches or excavations where there is an oxygen deficiency or a combustible mixture of methane gas without first taking precautionary measures. A landfill employee shall be designated as the safety monitor who would be trained in the use of gas-detection instruments and safety equipment.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure has been identified and will be incorporated into the Project:

MM-179 A portable explosive gas-detection device shall be used in trenches and excavations to determine the presence of methane gases. If unsafe concentrations of gas exist, all employees would be immediately removed from the area of unsafe gas concentration. The safety monitor would be responsible for ensuring that appropriate worker safety equipment is operable, as well as worker education and instruction correctly implemented, to prevent the potential for methane gas explosions.

The analysis presented in the Addendum indicates that additional mitigation measures beyond those identified in the SEIR are not required.

5.13 Police/Sheriff Services

Reference: For a complete discussion of police and sheriff services, see Section 4.14.2 (Police) of the SEIR and Section 3.3.4 (Fire/Sheriff) of the Addendum.

5.13.1 Potential Effect: Security. Potential security problems resulting from unauthorized entry could include unauthorized dumping, scavenging, vandalism, or arson.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The City of Los Angeles Police Department (LAPD) serves the City portion of the landfill, and the Los Angeles County Sheriff's Department (LASD) serves the County portion of the landfill.

2. The Project site is topographically isolated within the region, especially within the Sunshine Canyon area. Because of the site's physical location and surrounding steep terrain, the Project area provides an effective barrier against unauthorized access.

3. The Project Proponent currently maintains 24-hour security personnel at the landfill entrance to prevent and deter unauthorized entry.

4. The Project Proponent currently maintains a perimeter 6-foot-high chainlink fence along the eastern portion of the Project site next to the landfill entrance to discourage unauthorized entry by persons or vehicles. This fencing is routinely inspected (at least monthly) by landfill employees to ensure that it has not been damaged and to confirm that it does not contain abnormalities such as loose fence tension or malfunctioning gates or locks, and that the fencing continues to provide a deterrent to unauthorized access to the landfill site. Annual inspections for corrosion and rust are also conducted by landfill employees. In addition, "No Trespassing" signs are posted and positioned along perimeter fencing around the site.

5. An exterior lighting system is provided around all buildings, storage areas, high-traffic, and parking areas at the Project site.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-180 The Project Proponent shall maintain perimeter fencing in and around the site in accordance with CCR, Title 14, § 17658 to discourage illegal entry to the landfill. Where existing topography conditions create an effective barrier, no perimeter fencing shall be installed. Entrance and access gates shall remain locked when the landfill facility is not in operation. All existing perimeter fencing shall be inspected on a routine basis by the landfill operator, and necessary repairs shall be made to ensure a continued deterrent for unauthorized entry to the Project site. Additionally, the Project Proponent shall maintain posted "no trespassing" signage at the exterior perimeter fencing nearest the Project site entrance.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

5.14 Utilities (Electricity, Water)

Reference: For a complete discussion of utilities, see Section 3.2.11 (Public Utilities) of the FEIR; Section 4.16.1 (Electricity) and Section 4.16.4 (Water) of the SEIR; and Section 3.3.5 (Utilities/Other Services) of the Addendum.

5.14.1 Potential Effect: Electricity. The proposed Project would result in increased electrical consumption of approximately 500 kilowatt hours (kWh) per day due to the installation of new mechanical equipment and environmental control systems.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Electrical service for the City portion of the Project site is provided by the Los Angeles Department of Water and Power (DWP). Power for the existing electrical uses is supplied from DWP's 4.8-kilovolt (kV) distribution lines located adjacent to the site along San Fernando Road. Power for the 4.8-kV distribution system in the Project area is supplied from Balboa Distribution Station 86 located at 12960 Balboa Boulevard, less than one mile south of the site. The major distribution lines in the site area are fed via the 34.5-kV distribution lines along San Fernando Road, immediately east of Balboa Boulevard.

2. Electricity is provided to the County portion of the Project site by Southern California Edison (SCE) from an overhead 16-kV distribution line located within Weldon Canyon that connects to two existing pole lines located on-site. Power to this line is supplied from the Newhall substation located at the northwest corner of Lyons Avenue and Wiley Canyon Road. Two SCE aboveground electrical transmission lines traverse the Project site. The first is identified as the Chatsworth-MacNeil-Newhall-San Fernando 66-kV (50-foot-wide) Transmission Line. This line traverses the Project site along the City/County boundary line Six transmission towers are located on the Project site that are part of this distribution system. The second transmission line (two circuits) is identified as the MacNeil-Newhall-San Fernando 66-kV (60-foot-wide) Transmission Line. This line runs along the easterly side of the Project site boundary, parallel to the I-5 Freeway. Electrical Tower No. 154 of

the Chatsworth-MacNeil-Newhall-San Fernando Transmission Line is located in a slope area that has unstable soil conditions.

3. Electricity is consumed on-site to provide power for environmental protection and control systems (i.e. LFG collection and extraction system and flare station, etc.), water pumps, site security and building lighting, heating, and air conditioning. Current electrical consumption at the existing inactive landfill is estimated at 100 kWh per day. Current electrical consumption at the operational County Landfill is estimated at 200 kWh per day. Electrical consumption occurs at similar ancillary uses at the existing County Landfill with the addition of the scale house, leachate treatment system, environmental monitoring facility, administrative building, and employee building.

4. Development of the proposed City/County Landfill Project will eventually require the removal and relocation of the underground electrical power line located underneath the landfill access road. Relocation of the underground power line would occur in conjunction with Project sequencing to accommodate the development of new landfilling areas on-site.

5. Development of the proposed Project will also eventually require the relocation and reconstruction of the Chatsworth-MacNeil-Newhall-San Fernando Transmission Line towers located on the Project site. The Project Proponent has filed a request with SCE for such relocation and has provided funds necessary for completion of an engineering study to delineate a specific design for the relocation of the towers around the back (west) side of the County Landifill.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measures have been identified and have been or will be incorporated into the Project:

MM-181 The Project Proponent shall incorporate measures that will exceed minimum efficiency standards for Title 24 of the CCR.

MM-182 Built-in appliances, refrigerators, and air conditioning equipment shall exceed the minimum efficiency standards for Title 24 of the CCR.

MM-183 Buildings shall be well-sealed to prevent outside air from infiltrating and increasing interior air conditioning and space heating loads. A performance check of the installed air conditioning and space heating systems shall be completed by the Project Proponent prior to the issuance of the certificate of occupancy to ensure the system properly operates.

MM-184 Thermal insulation that exceeds requirements established by the CCR shall be installed in walls and ceilings.

MM-185 Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.

MM-186 Heat-reflective draperies shall be installed on appropriate exposures.

MM-187 Fluorescent and high-intensity-discharge lamps, which give the highest light output per watt of electricity consumed, shall be installed wherever possible, including all parking lot and site lighting to reduce electricity consumption.

MM-188 Occupant-controlled light switches and thermostats shall be installed to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.

MM-189 Time-controlled interior and exterior public area lighting limited to that necessary for safety and security shall be installed.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

5.14.2 **Potential Effect: Water.** The proposed Project would result in increased water consumption of approximately 221.4 acre-feet of water per year. This equates into an approximate monthly usage of 18.45 acre-feet (or 6,027,600 gallons) or 200,920 gallons per day.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into, the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. Potable water is supplied to the Project site by the City DWP via an existing 16-inch-diameter water distribution line located underneath San Fernando Road. Existing capacity is sufficient to meet current site usage and consumption demands.

2. Water supplied from DWP is metered as it enters the landfill site near the main entrance located adjacent to San Fernando Road. Water is then conveyed through feeder lines within the canyon and pumped directly into an existing 100,000-gallon water storage tank located near the western perimeter ridgeline of the Project site area. The existing water distribution system within the Project site is owned, operated, and maintained by the Project Proponent. The entire system (within the City portion of Sunshine Canyon) includes one 100,000-gallon storage tank, several water pumps, distribution piping, overhead truck filling stations, and fire hydrants. A similar system is used for County Landfill operations, except that the water storage tank has a capacity of 265,000 gallons. That water tank is located next to the existing County Landfill administrative offices.

3. On-site water usage is primarily used for dust control and landscape irrigation. A small amount of potable water is used for employee drinking and sanitation needs. Current on-site consumption is approximately 50,000 gallons per month. To reduce the need for on-site water usage, the Project Proponent uses biodegradable soil stabilizers to control dust, silt, and erosion, and has planted drought-tolerant vegetation.

4. The DWP receives its water supply from local wells, the Los Angeles Aqueduct Metropolitan Water District (MWD), and recycled water used for nonpotable applications. Based on demand projections contained in the Urban Water Management Plan, there is adequate water supply to meet demand for the next 20 years.

5. The City has installed a reclaimed water line that commences at the Donald C. Tillman Water Reclamation Plant and terminates near Hansen Dam in the City. The main purpose of this reclaimed water line is to provide groundwater recharge of the San Fernando Water Basin. Because the route of the line follows Woodley Avenue, the line is not sufficiently close to the landfill to reasonably provide reclaimed water service.

6. To implement the proposed Project, the 265,000-gallon water storage tank would be relocated to the northeast portion of the Project site and connected to a piping distribution system and the DWP water line located underneath San Fernando Road. Two 50-horsepower water booster pumps would be installed near the landfill entrance to provide pumping capabilities so that water could flow upward to the relocated water tank. All water distribution facilities and equipment within Sunshine Canyon would be owned and maintained by the Project Proponent. In addition, and if necessary, another 265,000-gallon water storage tank would be used. The existing 100,000-gallon water tank (in the City portion of Sunshine Canyon) would continue to be used for irrigation and dust suppression activities.

7. In addition, development of the proposed Project would eventually require the removal and relocation of the underground waterline located underneath the landfill access road. Relocation of the water line would occur in conjunction with Project sequencing to accommodate the development of new landfilling areas on-site.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been or will be incorporated into the Project:

MM-190 The Project Proponent shall coordinate with DWP in advance to efficiently obtain potable water for delivery to the construction site and to meet any restrictions imposed.

MM-191 When reclaimed water lines are extended into the Project area, and if economically feasible, reclaimed water would be utilized on-site for irrigation and dust suppression. Prior to the submittal of design plans, the Project Proponent shall investigate the possibility of utilizing reclaimed water at the Project site.

MM-192 During the site-life of the landfill and ancillary facilities, the Project Proponent shall effectively utilize water-conservation measures at the Project site. These measures may include the following:

- The Project Proponent shall install an efficient drip irrigation system that minimizes runoff and evaporation, and provides water distribution in an efficient manner.
- A dust suppression additive shall be utilized on-site to minimize water usage.
- Green waste/wood waste (after grinding) shall be used on-site as mulch material for revegetation purposes. Mulch shall be applied on the top layers of revegetation areas to improve the water-holding capacity of the soil.
- On-site revegetation shall include the use of water-conserving plant materials to the greatest extent possible.
- Use of on-site seep water for irrigation and dust control.

MM-193 The Project Proponent shall collect and treat any leachate on-site for re-use in landfill operations, as allowed by the regulatory agencies, to reduce potable water supply demand.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.15 Environmental Safety

Reference: For a discussion of hazardous materials and environmental safety, see Section 3.2.13 (Hazardous Materials) of the FEIR; Section 4.9 (Risk of Upset) of the SEIR; and Section 3.4.2 (Environmental Safety) of the Addendum.

5.15.1 Potential Effect: Hazardous Materials. The inadvertent acceptance of hazardous waste at the proposed landfill has the potential to result in significant impacts on facility workers (e.g. dermal exposure or inhalation) if hazardous waste identification, training, and handling procedures are not properly implemented. Household hazardous waste (HHW) materials removed from the waste stream and stored on-site have the potential to result in impacts on facility workers if proper handling and storage procedures are not used. The proposed operation of the landfill also has the potential to result in small spills of potentially hazardous liquids used during landfill operations.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The proposed Project would be designed as a Class III nonhazardous landfill facility and would not be a generator of repository for hazardous wastes. No hazardous, acutely hazardous, radioactive, infectious medical, or liquid wastes will be accepted at this facility.

2. The Project Proponent implements a hazardous waste load-checking program at the Project site. This program includes employees visually inspecting incoming waste-hauling loads at the scale house area. In addition, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles and radiation-detecting devices are used at the scale house area to prevent the unauthorized disposal of hazardous waste materials.

3. The landfill operation currently provides signage at the landfill entrance informing waste haulers that the facility is designated as a Class III nonhazardous landfill site. Signage informs waste haulers of the rules and regulations governing the disposal of hazardous waste.

4. It is expected that small volumes of HHWs would remain undetected and be disposed of at the proposed landfill. It appears that these wastes are infrequently mixed in with residential solid wastes by residential customers. However, approximately 46 percent of all refuse entering the Project site would be delivered via transfer trucks. These transfer trucks would haul residual (i.e. nonrecyclable) waste materials from transfer stations/material recovery facilities (MRFs). All transfer stations/MRFs have existing load-checking programs in-place. At these facilities, HHW, if found, is manually sorted and picked out of the waste stream and disposed of properly. In some cases, this material can be recycled.

5. The operation of the proposed Project would include the use and storage of a limited volume of potentially hazardous liquids including hydrocarbon condensate, motor oil, diesel fuel, cleaning solvents, propane (as a liquid), and ammonia.

Based on the analysis presented in the FEIR, SEIR, and Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-194 The landfill shall be operated as a Class III landfill: no liquid, acutely hazardous, radioactive material, or infectious medical wastes will be accepted.

MM-195 Haulers disposing of drums (i.e. 55-gallon) shall have drums triple-rinsed with tops and bottoms removed prior to acceptance.

MM-196 Notices shall be posted at prominent locations on-site to notify waste haulers about hazardous waste policies of the Project Proponent and to inform haulers that hazardous waste cannot be disposed of at the facility. Signage shall help inform waste haulers of the rules and regulations governing the disposal of hazardous waste.

MM-197 The Project Proponent will post a sign at the entry gate at San Fernando Road to indicate the following:

- The telephone number by which persons may on a 24-hour basis contact the Project Proponent to register complaints regarding landfill operations;
- The telephone number of the LEA and the hours when the number is staffed;
- The telephone number of the enforcement offices of the SCAQMD and the hours when the number is staffed.

MM-198 A refuse inspection program that includes direct visual inspection, remote television monitors to inspect incoming rolloff-type loads and open-top vehicles and radiation detecting devices, shall be implemented by the Project Proponent to prohibit the illegal dumping or disposal of liquids and hazardous wastes at the landfill.

MM-199 The Project Proponent shall implement a hazardous waste load-checking program. This program shall include inspecting random loads for hazardous wastes in a segregated area of the landfill, and landfill employees shall scan waste materials as they are being unloaded at the active working face. Hazardous waste load checks at the proposed City/County Landfill will be 1.5 load checks per 1,000 tons of solid waste received at the landfill for the first year of operation. However, after the first year of operation, Project Proponent may request that the LEA decrease the required load checking frequency to one load check per 1,000 tons of waste received at the City/County Landfill.

MM-200 If hazardous waste materials are discovered, emergency response shall include worker identification and notification procedures, cordoning off the area, and notifying the County LEA, Cal-EPA and DTSC. Once hazardous waste is identified, the material shall be removed, containerized, and temporarily stored on-site, if safe to handle. In the unlikely event that acutely hazardous material is discovered, the immediate area will be evacuated, and a qualified hazardous waste hauler shall be contacted for immediate collection and disposal of the material at a permitted Class I hazardous waste landfill. After any such incident within the County portion of the landfill, all necessary reports shall be completed and filed by the Project Proponent with the following agencies: County of Los Angeles Office of the District Attorney, Environmental Crimes Unit; Los AngelesCounty Fire Department (LACFD); County LEA; and LARWQCB.

MM-201 Landfill employee training programs on hazardous waste detection shall be conducted. These programs shall be presented during preemployment and for subsequent annual review for all employees.

MM-202 The spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g. hoses or extinguishers), and spill containment/mitigation (e.g. absorbents) shall be provided.

MM-203 Inspectors shall be employed on-site for inspection of waste materials. Inspectors shall be deemed qualified through training and experience to perform assigned duties.

MM-204 In addition, the Project applicant shall install video monitoring equipment at the site to ensure compliance with the conditions of operation. The Project applicant shall retain video tapes for one year after the recordings are made. The County shall have access to all recordings.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the FEIR and SEIR are not required.

5.15.2 **Potential Effect: Airport Safety**. The potential exists for bird/aircraft collisions due to the location of Whiteman Air Park approximately 5 miles southeast of the Project site in Pacoima.

Findings: The County hereby finds that changes or alterations have been required in, or incorporated into, the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts and related mitigation measure are presented in support of these findings:

1. In accordance with CCR, Title 14 § 17258.10, landfill facilities must address airport safety within the context of the following regulations:

   Owners or operators of new municipal solid waste landfill facility (MSWLF) units, existing MSWLF units, and lateral expansions that are located within 10,000 feet (3,048 meters) of any airport runway end used by turbojet aircraft or within 5,000 feet (1,524 meters) of any airport runway end used by only piston-type aircraft must demonstrate that the units are designed and operated so that the MSWLF unit does not pose a bird hazard to aircraft.

   Owners or operators proposing to site new MSWLF units and lateral expansions located within a 5-mile radius of any airport runway end used by turbojet or piston-type aircraft must notify the affected airport and the Federal Aviation Administration (FAA).

   The owner or operator must place the demonstration made pursuant to paragraph (a) of this section in the operating record and notify the board that it has been placed in the operating record.

2. The Whiteman Air Park supports approximately 300 operations per day. The airport is too small to support any commercial activity, and approximately 99 percent of all operations are

piston-type aircraft. No recorded bird strikes at Whiteman Air Park have been attributed to past landfill operations. Because this airport verges on the 5-mile radius as denoted in CCR § 17258.10, the Project Proponent is obligated to notify the affected airport and appropriate FAA office.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure has been identified and has been or will be incorporated into the Project:

MM-205 In accordance with CCR § 17258.10 and 40 CFR Section 258.10, the Project Proponent will notify Whiteman Air Park and the FAA of the proposed Project and projected startup date.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

5.16 Land Use

Reference: For a discussion of land-use issues, see Section 2.0 (Description of Environmental Setting) of the FEIR; Section 4.7 (Land Use) of the SEIR; and Section 3.4.3 (Land Use) of the Addendum.

5.16.1 Potential Effect: General Plan Amendment and Zone Change. Development of the proposed Project required a General Plan Amendment to the Granada Hills-Knollwood Community Plan from the existing "Open Space" land-use designation to "Heavy Industrial" and a zone change from the existing zoning designation of "A1-1-O" (Agricultural Zone, Height District 1, and Oil District Overlay) to A.M.3-1-O" (Heavy Industrial Zone) within the City of Los Angeles. These entitlements were granted by the City in 1999.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts are presented in support of these findings:

1. The proposed Project would consist of the development, operation, maintenance, and monitoring of a Class III nonhazardous solid waste landfill with an authorized life of approximately 30 years. A portion of the proposed City/County Landfill footprint is located on ±194 acres within the City portion of Sunshine Canyon. In order to facilitate the design of the proposed City/County Landfill, an area of approximately 42 acres within the County portion of Sunshine Canyon would be developed. This acreage would be engineered to ultimately connect (both vertically and horizontally) to the proposed landfill in the City and the operational County Landfill (landfill footprint of ±215 acres).

2. The proposal also consists of developing and operating numerous ancillary areas and facilities to support landfilling operations at the City/County Landfill. These include an on-site green waste/wood waste recycling area, a community "buyback" center, and an environmental learning center. All of these proposed uses would be located within the City portion of Sunshine Canyon and would support the City/County Landfill. The proposed Project would also use ancillary facilities that currently support the existing County Landfill. These include the scale house, scales, administrative offices, caretaker facility, lunchroom/locker storage, maintenance and control buildings, and certain environmental protection and control systems (i.e. leachate treatment plant and storage tanks, surface

drainage systems, and water storage tanks). The use of these facilities and control systems for landfilling operations would continue until development occurs on or near the ±42 acres within the County. Development in this area would necessitate the removal and/or relocation of many of these facilities onto City land.

3. The inactive City landfill (in operation from 1958 through 1991) is identified on the land-use map for the Granada Hills-Knollwood Community Plan. A footnote references the Project site and describes the historical operation of the landfill and its pending closure. However, the footnote does not identify the 30-year mandated closure and postclosure maintenance period, nor its inclusion in the combined City/County Landfill Project. The Project site also includes the County Landfill, which is considered an active industrial use. That landfill has the potential to increase in capacity under CUP 00-194. The collective proximity of these uses to the Project site further reduces the viability of the site as desirable open space.

4. The General Plan land-use and zoning designations within the County allow and permit the existing and proposed landfill operations within the County.

5. The proposed Project is consistent with City and County solid waste management plans by providing short-, medium-, and long-term disposal capacity, thereby lessening the potential for impacts on public health and safety.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure was identified and was incorporated into the Project:

MM-206 Prior to development of the City/County Project, the Project Proponent will obtain (and did obtain) from the City a General Plan Amendment from an "Open Space" land use designation to "Heavy Industrial" and a zone change from "A1-1-O" (Agricultural Zone, Height District 1, and Oil District Overlay) to "[T][Q]M3-1-O" (Heavy Industrial Zone).

5.16.2 Potential Effect: Sensitive Land Uses. Potentially sensitive land uses include six trailers located immediately east of the landfill entrance across San Fernando Road (and ± 700 feet from the proposed landfill footprint). Additionally, the closest residential house (Timber Ridge Drive in Granada Hills) would be located ± 1,700 feet south of the proposed landfill footprint.

Findings: The County hereby finds that changes or alterations have been (or will be) incorporated into the proposed Project that mitigate or avoid the significant adverse effects on the environment.

Facts in Support of Findings: The following facts are presented in support of these findings:

1. The proposed City/County Landfill footprint's maximum vertical height at buildout would result in a final fill elevation (at its top deck area) of 2,000 feet MSL. The perimeter ridgeline along the southern boundary of the Project site (near the City/County boundary) rises to a maximum elevation of about 2,150 MSL. Elevations in this area would effectively block interior views of the final fill areas from the south and southwest, especially residential uses located in the community of Granada Hills.

2. The Project site is topographically isolated and lies within a portion of the Santa Susana Mountains. The ± 100-acre buffer area located along the southern perimeter of the Project site has undergone extensive revegetation and has been planted with over 10,000 trees. Many of these trees are native and are over 15 feet high. This buffer area elevates several hundred feet higher (i.e. ranging in height from 1,425 to 1,975 feet MSL) than existing

residential areas located to the south (i.e. approximately 1,300 to 1,400 feet MSL). The existing perimeter ridgeline, buffer area, and portions of the existing inactive landfill are located between these uses, thus forming an effective transition between residential use and proposed landfill operations and activities.

Based on the analysis presented in the SEIR and Addendum, the following mitigation measure was identified and was incorporated into the Project:

MM-207 Maintain and enhance the ±100 acre open space area in the southern portion of the site by implementing revegetation programs in conjunction with on-site programs.

The analysis presented in the Addendum indicates that mitigation measures beyond those identified in the SEIR are not required.

6.0 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT FEASIBLY BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The County has determined that specific mitigation measures and/or design changes presented in the FEIR, SEIR, and Addendum and required of the Project Proponent will result in substantial mitigation of those significant or potentially significant environmental effects identified in these documents. However, based on the significance criteria established by the City and County, these measures and/or design changes will not result in avoiding those significant or potentially significant environmental effects for the following environmental topical issues. (Note that these significant and unavoidable effects were identified in the FEIR and SEIR; no additional significant unavoidable effects were identified in the Addendum).

6.1 Air Quality (Project-Specific and Cumulative Effects)

Reference: For a complete discussion of impacts relating to Air Quality (Construction and Operations), please see Section 3.2.6 (Air Quality) of the FEIR, Section 4.2 (Air Quality) of the SEIR, and Section 3.2.2 (Air Quality) of the Addendum.

Description of Significant Effect: Project construction would include the removal of existing vegetation, excavation and grading, construction of the landfill, construction and/or relocation of ancillary facilities, and installation of environmental protection and control systems. Construction-related air pollutant emissions are associated with the site preparation and construction phasing of the proposed Project; they include fugitive dust emissions and exhaust emissions from construction equipment, material delivery trucks, and workers' vehicles. Construction aspects of the Project, (e.g. the installation of the liner system and access road improvements) will be constructed in phases as landfill development occurs. Diesel-powered, earthmoving vehicles (or other heavy equipment) would be utilized during the grading and construction phasing of the proposed City/County Landfill Project.

As a reasonable worst-case scenario, grading operations are expected to occur during a 10-hour workday. The following vehicles would create emissions during Project construction: dozers, an excavator, compactors, scrapers, loaders, rock trucks, water trucks, materials delivery trucks, and construction workers' cars and trucks.

Fugitive dust during construction is generated by either a mechanical disturbance to soil (e.g. grading operations or agricultural tilling), or by wind-related entrainment of dust particles. Moreover, site preparation, clearing, surface grading, excavation, and the use of heavy equipment and trucks on unpaved surfaces have the potential to generate significant quantities of dust during the initial site preparation activities.

During operation, vehicles will be utilized to transport refuse to the landfill. Wastes are deposited and compacted within prepared cells and are covered daily with cover material. When landfill capacity is exhausted, a new area is excavated and lined with an impermeable membrane, and cells are formed. Heavy equipment would be used to prepare new landfill cells, and cover and compact refuse on a daily basis. All equipment is projected to operate 10 hours per day. The following heavy equipment would create daily emissions: bulldozers, a grader, compactors, dirt trucks, excavators, scrapers and water trucks.

Volatile organic emissions are associated with the storage and transfer of fuel to Project-related vehicles. The 220 transfer trucks (and 640 refuse collection trucks) are anticipated to travel approximately 34,280 miles per day. Based on an average fuel consumption of 5.9 mpg, an estimated

5,810 gallons of fuel may be used daily. All of these vehicles are assumed to use diesel fuel. Gasoline will be utilized by landfill employees who would be commuting to the site, service vehicles, and light-duty vehicles that would transport wastes to the site.

Collected landfill gas (LFG) would be burned in a total of five high-efficiency flares, each with a total volume disposal capacity of approximately six million standard cubic feet per day (scf/day) or 4,167 standard cubic feet per minute (scf/min).

Fugitive dust is produced by daily site operations (e.g. landfilling operations, the preparation of new cells, procurement of cover material, wind action on material that has been stockpiled during the initial construction, and truck travel on both the paved access roadway as well as on the unpaved haul route surface to the active working face). Heavy equipment would be utilized to prepare new landfill cells, procure cover materials, and compact refuse on a daily basis. These activities would be subject to erosion and to potential fugitive dust emissions. Because dust generally settles on horizontal surfaces, on-site vehicular travel over paved surfaces would also produce fugitive dust emission. Dust is also associated with vehicular travel over unpaved or hard-packed surfaces, such as the haul road.

The Project area is currently out of attainment for both O_3 and PM_{10} (fine particulate matter). Project construction is projected to produce NO_x and PM_{10} in excess of those levels deemed by the SCAQMD as significant. All other construction-related emissions are estimated to remain below both daily and quarterly threshold levels. Emissions from Project operations are anticipated to exceed the significance criteria for CO, NO_x, SO_x , ROG and PM_{10} . Construction and operation of cumulative projects will further degrade local air quality, as well as the air quality within the SCAB. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. The greatest cumulative impact on regional air quality will be the incremental addition of pollutants (primarily from increased traffic associated with the development of residential, commercial and industrial projects, and the use of heavy equipment and trucks associated with construction of these projects). Emissions of CO and ROG, which are predominantly associated with vehicular travel, as well as SO_2 and the combustion of landfill gas, are projected to be significant on a cumulative level.

Findings: Pursuant to Public Resources Code § 21081(a)(1) and CEQA Guidelines § 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Project which will substantially lessen the significant environmental effects relating to air quality, as identified in the Final SEIR; however, impacts would not be reduced to a level below significance. In particular, the County and City find that implementation of feasible mitigation measures will substantially lessen construction air quality impacts, but that such impacts will remain significant because NO_x and PM_{10} emissions will exceed the thresholds of significance. Emissions from Project operations are anticipated to exceed the significance criteria for CO, NO_x, SO_x, ROG and PM_{10}. Pursuant to Public Resources Code § 21081(a)(3) and CEQA Guidelines § 15091(a)(3), there are not feasible mitigation measures nor Project alternatives available that would fulfill the basic objectives of the Project in order to mitigate the impact below a level of significance. The Project alternatives identified in Draft SEIR Section 5.0 would not result in a reduction in daily Project emissions, since similar air quality impacts would result at other in-County (or remote) landfills and would still be necessary if the proposed Project is not approved. Furthermore, an updated account of certain alternatives that were once considered and later rejected, along with the current consideration of a No Project Alternative, is provided in Section 7.0 herein. As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable due to overriding considerations.

Facts in Support of Findings: The following facts are presented in support of these findings:

1. As defined by the SCAQMD CEQA Air Quality Handbook, residual air quality impacts are expected to remain significant for criteria pollutants. During construction of the Project, emissions for NO_x and PM_{10} would result in an exceedance of the SCAQMD significance thresholds after the incorporation of mitigation measures. Operation of the Project would result in exceedances of the CO, NO_x, SO_x, ROG, and PM_{10} and criteria would remain significant following the incorporation of mitigation measures.

2. The identified air quality impacts predominantly relate to necessary construction and operational aspects of the landfill Project and/or the cumulative development of related projects in conjunction with the proposed Project; the impacts are a result of operations of heavy equipment for site construction, trucks which will be utilizing the Project site, and refuse trucks accessing the Project site. Feasible mitigation measures and control efficiencies for each dust-generating and additional operation (e.g. paved roads, unpaved roads, heavy operating equipment, and site erosion) have been included (and required) in the Project in order to mitigate air quality impacts to the extent feasible.

3. The ability to mitigate impacts from exhaust emissions which would result from the use of heavy equipment necessary to construct and operate the landfill is limited; however, fugitive dust impacts from construction, physical site disturbance, material deliveries, employee commuting, and potential wind erosion during high wind episodes will be mitigated.

4. These mitigation measures would substantially reduce impacts; however, even with their implementation, Project-generated and Project-related cumulative air quality impacts are considered significant and unavoidable, given the nature of the Project as a sanitary landfill for the disposal of municipal solid waste from the surrounding communities. These unavoidable impacts cannot be alleviated, even with a reduced volume capacity or additional design modifications it would be infeasible and/or would still result in significant environmental impacts on air quality. A reduced volume capacity landfill would not ensure sufficient disposal capacity for both the City and County, and it would not provide a minimum of 15 years of disposal capacity for the City as State law requires. The Project is located proximate to City and County generated waste streams. Expanding the existing landfill footprint and operation at this location, rather than developing a new landfill at an undisturbed site which would not be served as well by the existing transportation system, would minimize significant environmental impacts. Transporting municipal solid waste to a designated remote location would still result in the air quality emissions generated by the refuse trucks that collect and dispose of trash.

Mitigation Measures: Based on the analysis presented in the Final SEIR, the following feasible mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-208 The following mitigation measures will reduce emissions to the maximum extent reasonably feasible:

a. The Project Proponent will maintain equipment in tune per manufacturer's specifications.

b. The Project Proponent will use catalytic converters on gasoline-powered equipment.

c. The Project Proponent will tune all diesel engines to manufacturers' specifications.

d. High-pressure fuel injectors will be installed.

e. Heavy equipment will use reformulated, low-emission diesel fuel.

f. The Project Proponent will substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible.

g. Where applicable, equipment will not be left idling for prolonged periods.

h. The Project Proponent will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e. Stage II smog alerts). *(Mitigation Measure Section 4.2.11 in Final EIR).*

MM-209 Mitigation measures a and b will be applied to the Project Proponent's operated refuse trucks that utilize the Project site, and the remaining mitigation measures will be applied to all refuse trucks accessing the Project site.

a. Refuse trucks shall be maintained in proper tune. Trucks observed to emit excessive amounts of smoke (particulate matter) shall either be tuned up or repaired, as applicable.

b. Where applicable, high-pressure fuel injector nozzles shall be used, and diesel engines shall be tuned to manufacturers' specifications.

c. Using a progressive fee schedule, the Project Proponent shall encourage all refuse trucks accessing the project site to carry full loads.

d. The Project Proponent shall encourage trucking to be performed during off-peak hours. This shall be accomplished through coordination of deliveries with the transfer stations that supply refuse, restrictions in the hours of operation, and/or a fee schedule that penalizes haul trucks arriving during peak congestion periods. This will reduce emissions by increasing truck speeds and eliminating prolonged idling in traffic.

e. When operating on-site, trucks shall not be left idling for periods in excess of 5 minutes.

f. Private owner-operators shall be warned that, if their trucks emit excessive amounts of smoke as determined by scale house workers, they will not be allowed future access to the landfill facility.

MM-210 Consistent with the alternative fuel requirements applicable to the City side of the Landfill, including rules and regulations of federal, state and district agencies having jurisdiction over such matters, the Project Proponent shall either purchase or investigate the purchase of alternative fuel vehicles and equipment, as deemed feasible by the County Technical Advisory Committee, as follows:

a. Upon the effective date of this grant, all light-duty vehicles operated at the facility

shall be alternative fuel vehicles.

b. Within 12 months from the effective date of this grant, 10 alternative fuel refuse collection trucks or transfer trucks shall be purchased by the Project Proponent and put into operation at the facility.

c. Within three years after the date the Technical Advisory Committee determines that the technology and economics are feasible, operation of all transfer trucks entering the facility shall be alternative fuel vehicles.

d. Within three years after the date that the Technical Advisory Committee determines that the technology and economics are feasible, all transfer and collection trucks owned and leased by the Project Proponent and used at the facility shall be alternative fuel vehicles.

e. Within six years after the date that the Technical Advisory Committee determines that the technology and economics are feasible, 75 percent of all trips by trucks which have a capacity of nine tons or greater entering the Landfill shall be made by alternative fuel vehicles.

f. Within one year after the commencement of joint landfill operations, the Project Proponent shall design and begin implementation of an alternative fuel, heavy-duty, off-road equipment pilot program.

g. The Project Proponent shall submit, as part of its annual report to the Technical Advisory Committee, an ongoing evaluation of compliance with Items a-f above. Apart from any conflicting rules and regulations of federal, state and district agencies having jurisdiction, technical or economic infeasibility shall be the only bases on which the Project Proponent may appeal the requirements established by this condition.

MM-211 Truck Travel and Fugitive Dust Emissions

a. To minimize fugitive dust emissions, the access roadways shall be paved, as necessary, and haul roads to the working face areas shall be hard packed and or covered with a crushed stone layer. Paved and/or crushed stone roadways shall extend up to new active fill areas as development of the landfill progresses.

b. Curbs and gutters shall be constructed. At least twice daily, watering or wet sweeping of paved roads to remove windblown surface dust shall occur. (AP-42 assigns a control efficiency of 50 percent for twice weekly cleaning of industrial paved roads. With twice daily cleaning, a control efficiency in excess of 90 percent is predicted).

c. For unpaved clay roads, mitigation shall include a SCAQMD-approved chemical dust suppressant with a manufacturer's demonstrated control efficiency in excess of 90 percent shall be regularly applied to inactive areas, during windy periods.

d. For unpaved crushed stone covered roads, mitigation shall include the use of a crushed stone topcoat in addition to the regular application of a SCAQMD-approved chemical dust suppressant and subsequent watering, a control efficiency in excess of 95 percent is predicted. (Mitigation Measure Section 4.2.12 in the FEIR).

MM-212 Heavy Equipment Operations

a. Operations shall be restricted to no more than a 10-acre active working face area at any given time.

b. Pursuant to the 1999 City approval, the disturbed area (subject to the surface erosion) will be reduced from 40 acres to 20 acres when operations occur south of the smaller former filling area of the existing inactive City Landfill.

MM-213 Site Erosion

a. To the extent technically feasible, material excavated from one portion of the Project site shall be used as daily cover material in an adjacent area to minimize travel distances for such cover material.

b. Subject to approval by the California Integrated Waste Management Board (CIWMB), filling in each active area shall be prolonged through the utilization of a 20-foot maximum cell height. This would reduce the area of excavation and minimize the disturbances to the landfill, thereby providing an effective control of fugitive dust.

c. A temporary vegetation cover shall be established on all slopes that are to remain inactive for a period longer than 180 days.

d. A SCAQMD approved soil stabilization (sealant) product shall be used to retard soil erosion and enhance revegetation. Soil sealant shall be applied when necessary to selected working areas of the landfill. The sealant will also be used as a binder or tackifier to hold seed during revegetation, mulch, and fertilizers in-place until grasses become established and stabilize on the landfill surface. (Mitigation Measure Section 4.2.12 in the FEIR).

6.2 Biota (County FEIR Findings for County Landfill)

Reference: For a complete discussion of impacts relating to biological resources, see FEIR Section 3.2.4 (Biota); SEIR Section 4.4 (Biological Resources); and Addendum Section 3.2.3 (Biota).

Description of Significant Effect: The character of foraging areas throughout the canyon would be disturbed by on-site operations in the upper portion of the canyon, and by vehicle traffic traveling through the base of the canyon to access the landfill. Not all species would necessarily be affected by these disturbances. However, filling the interior of Sunshine Canyon would destroy or displace existing vegetation, natural habitat, and wildlife on the landfill site.

Tree species at the Project site are a mixture of native and nonnative species. Tree surveys were conducted for the FEIR, and the results of these surveys are presented in Appendix Z (Oak Tree Survey Report) of the FEIR. The predominant native tree species in the Project area is Coast live

oak, and oak woodlands are of particular concern in the Project area. The Project would result in the direct removal of trees and the loss of oak woodland habitat, which would result in a significant impact.

A part of the County portion of the landfill was within the boundaries of a County Significant Ecological Area (SEA) 20 (Santa Susana Mountains); however, pursuant to the 1993 County approval, the County portion of Sunshine Canyon was removed from SEA 20, thereby reducing the size of SEA 20 by approximately 542 acres, or 2.5%.

Findings: Pursuant to Public Resources Code § 21081(a)(1) and CEQA Guidelines § 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Project which have substantially lessened the significant environmental effects relating to biota, as identified in the FEIR; however, impacts have not be reduced to a level below significance. In particular, the County finds that implementation of feasible mitigation measures has substantially lessened impact to biota, but impacts to Coast live oak trees and SEA 20 cannot be mitigated to a level below significance. As described in the Statement of Overriding Considerations, the County has previously determined that this impact is acceptable because of overriding considerations.

Facts in Support of Findings: The following facts and related mitigation measures are presented in support of these findings:

1. The County side of the landfill lies entirely within land designated as "Significant Ecological Area" (SEA) 20 (Santa Susana Mountains) on the County General Plan. The County Zoning Ordinance provides that projects within an SEA be designed so that wildlife corridors and water courses remain in their natural state. Since these provisions preclude the use of an SEA as a landfill, the Project Proponent requested an amendment to the General Plan for deletion of 542 acres from the SEA. Based on the FEIR and the studies contained therein, it has been determined that: (a) the area deleted from SEA 20 was approximately 2.5% of SEA 20, (b) deletion of the area has not substantially inhibited gene flow and wildlife movement, and (c) in light of the waste disposal needs of the County of Los Angeles, the deletion of the area from the SEA was in the public interest. The General Plan Amendment was approved concurrently with the Conditional Use and Oak Tree Permit 86-312-(5).

2. The approved amendments to the General Plan Policy, Land Use Policy, Special Management Areas, and Santa Clarita Valley Maps of the County General Plan excluded the proposed landfill expansion site from the aforementioned SEA; designated Sunshine Canyon as a planned landfill extension site on the Solid Waste Management Plan Map; and declared as a matter of policy in the Solid Waste Management Plan that uses inconsistent with the operation of the Sunshine Canyon landfill are prohibited within upper Bee and East Canyons adjacent to the landfill and that these areas are expressly identified as unsuitable for future landfill extension.

3. The General Plan Amendment redesignated land uses within the areas as Hillside Management, Non-Urban Hillside and residential (non-urban). The General Plan recognizes that many non-residential uses may be appropriately located in non-urban hillside management areas. Included in the listing of uses prospectively allowed are: "Waste disposal facilities that require Canyon locations as a buffer to urban uses. Effectuation of approved site restoration plans shall be required at the termination of such uses."

4. Following the adoption of the FEIR, the 1993 CUP required that the Project Proponent dedicate 426 acres in the western portion of the Project site, within an area referred to as East Canyon. The Project Proponent dedicated this land to the Mountains Recreation and Conservation Authority (MRCA) for use as open space, wildlife preservation and recreational use in order to mitigate for the reduction in the area of SEA 20.

5. Pursuant to the 1993 CUP, the Project Proponent also purchased 490 acres in Bee Canyon, located southwest of the landfill, and transferred ownership to the MRCA, which is maintaining the land as permanent open space.

6. In addition, the 1993 CUP required that the Project Proponent finance studies pertaining to the remaining SEAs.

7. Major vegetation communities observed within both the City and County portions of the Project site consist of riparian woodland, woodland with the dominant tree species of Coast (California) live oak, coastal sage scrub, chaparral, and grassland.

8. Tree surveys were conducted for both the FEIR and SEIR, and the results of these surveys are presented in Appendix Z (Oak Tree Survey Report) of the FEIR, Appendix B4 (Tree Report) of the SEIR, and Table 4.4-9 (Distribution of Trees with Qualifying Size) on page 4-194 (Section 4.4.3, Native and Nonnative Tree Resources) of the SEIR. The predominant native tree species in the Project area is Coast live oak; and oak woodlands are of particular concern in the Project area.

9. Development of the unincorporated County portion of the approved landfill entailed the removal of an estimated 2,850 oak trees, which is approximately 43 percent of the total number of oak trees within the County portion of the overall City/County Project site area. This rate of oak tree removal within the Project operational area results from the fact that the highest concentration of trees occurs within the canyon bottoms where filling must commence. Separately, development of the landfill in the City territory is involving additional removal of oak trees, which will occur over a longer duration and at a much slower rate, since the density of oak trees in the City area is well below that of the trees in the unincorporated territory.

10. The FEIR stated that no rare or endangered plants had been found on-site; however, Table 4.4-3 (Sensitive Status Plant Species Potentially Occurring at Sunshine Canyon Landfill) on pages 4-154 through 4-158 of the SEIR list sensitive plant species that could potentially occur on-site. Subsequent to preparation of the FEIR and SEIR, 3 plant species have been newly listed as threatened or endangered: Braunton's milk vetch (*Astragalus brauntonii*), Nevin's barberry (*Berberis nevinii*), and San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*). Wildlife species of special concern are listed in Table 8 (Species of Concern Actually Found at Sunshine Canyon or Potentially in the Region) on pages 137 through 138 of the FEIR, and Table 4.4-4 (Sensitive Status Wildlife Species Potentially Occurring at Sunshine Canyon Landfill) on pages 4-159 through 4-162 of the SEIR. Subsequent to preparation of the FEIR and SEIR, there is only one wildlife species which has been [newly] classified as threatened or endangered: the California red-legged frog (*Rana aurora draytonii*).

Based on the analysis presented in the FEIR and the Addendum, the following mitigation measures have been identified and have been (or will be) incorporated into the Project:

MM-214 The Project Proponent will (and did) dedicate to the Mountain Recreation and Conservation Authority (MRCA) approximately 426 acres in East Canyon for permanent open space, park and recreational use, and wildlife preservation. The instrument of dedication provided that no uses inconsistent with the landfill shall be allowed and provided for the right for the Project Proponent to enter onto the property to engage in studies or mitigation project, and maintain water tanks, access fire roads and other facilities which are required to operate the landfill.

MM-215 The Project Proponent shall (and did) provide for riding and hiking trails within the limits of the area that is to be dedicated and work with the County Department of Parks and Recreation to identify, relocate, and dedicate the necessary rights-of-way and easements for public use for the East Canyon, Bee Canyon, O'Melveny and Weldon Canyon Trails, which area ultimately totaled 81 acres.

MM-216 The Project Proponent will finance studies pertaining to the remaining SEAs as set forth in the 1993 CUP and Oak Tree Permit.

MM-217 The approximately 100-acre open space area located southeast of the existing City Landfill will be maintained as open space and will be enhanced with vegetation to promote wildlife. The area will not be developed (with the exception of development necessary to continue the existing use for gas and oil operations), and it will continue to serve as a buffer between the landfill operation and other properties.

MM-218 Revegetation of slopes and fill areas with appropriate native flora will be accomplished to support local fauna.

MM-219 Reestablishment of vegetation will be focused on revegetation with native species from local seed sources. Non-native species may be used only where quick cover or a nurse crop is desired. Acacias, eucalyptus and pepper grow more rapidly on bare site conditions than some natives. These planted trees will be removed by the Project applicant to favor the native trees once the natives become established.

MM-220 Replacement cover material will be obtained within the canyon to retain soil composition compatible with native flora and leave the surrounding topography undisturbed.

Revegetation and Oak Tree Mitigation

MM-221 The perimeter ownership external abutting slopes and peaks of the ridgelines surrounding the Sunshine Canyon Landfill shall remain undisturbed. The upper portions (50 vertical feet below ridgelines) of the closest adjacent abutting external ownership perimeter ridgeline will also be left undisturbed.

MM-222 After development of the initial fill area and ancillary facilities, clearing of existing on-site vegetation for operations will be done only when necessary to provide for new cut and fill areas of the site. Only small areas will be cleared at any one time. Wholesale or large-scale clearing in the canyons will not occur. With the removal of trees, pests and the entire habitat (ecosystem), slash and debris, the host materials for any pests will be removed entirely. In addition, the soils that have the potential to provide a suitable

habitat for pests will be removed. Forestry experts contracted by the Project Proponent will monitor the condition for the trees in the canyon for pest infestation.

MM-223 The Oak Tree Mitigation Plan (Exhibits C and D of the conditions of approval) is intended to meet or exceed the minimum replanting requirements of the Los Angeles County Oak Tree Ordinance; it includes measures for new plantings in Sunshine Canyon, as well as other off-site areas acceptable to the County Forester. The plan also provides for a 5-year monitoring and management program which will assure guaranteed survival for five years once trees are established and one-inch in diameter, and are one-foot above ground-level.

MM-224 The Project Proponent will provide a minimum 2:1 replanting of oaks, and a 5:1 replanting for big-cone Douglas fir with replacement oak and fir trees counting when reaching one-inch in diameter at one foot above ground-level. Other species will also be planted. The Project Proponent will maintain and monitor the oak trees for 5 years after reaching count-size status to provide a minimum 200% replacement. Oak Tree Mitigation Plans are provided in Exhibits C and D of the Conditions of Approval.

MM-225 All oak trees will be counted when removed to verify that adequate mitigation has been provided in accordance with the Oak Tree Mitigation Plan.

MM-226 The Project Proponent will replace all removed big-cone Douglas fir trees at a ratio of 5:1 (5 replants for each one removed) with guaranteed survival for 5 years following growth to one inch in diameter at one foot above ground-level. The higher stand densities of existing fir trees are on the uppermost ridge slopes and will not be disturbed by landfill development.

MM-227 Concurrent with and following landfilling operations, all grasses, trees, and shrubs will be planted on the landfill face in increments as indicated in the Revegetation Plan. Areas of the site will be revegetated as required by conditions and requirements of the California Integrated Waste Management Board (Revegetation/Closure Plan). Grasses, trees, and shrubs will be utilized to develop wildlife habitats and open space.

MM-228 The landfill will be planted with a mosaic of trees, shrubs and grasslands to provide a variety of wildlife habitats. As operating lifts are completed, the finished slope will be covered with 15 feet (in horizontal width) of amended soil and recycled green waste placed on the front surfaces of slopes which have received the site impermeable seal. As soils are added, amendments will be included to balance out any unsuitable characteristics, such as acidity (pH). Fertilizers will be added at the time of soil placement and will continue as part of the Project Proponent's Ongoing Maintenance Program. This soil cover will provide rooting material for the final vegetation. Revegetation will take place concurrently with filling operations as the landfill progresses up the canyon; only the active filling areas and other operations (liner preparation, cut-for-cover areas, etc.) of the landfill will be unvegetated. The remainder of the inactive disturbed areas on-site will be planted with either temporary or permanent vegetation, as applicable.

MM-229 The Project Proponent has already provided replacement riparian habitat on a 2:1 ratio as part of the overall Vegetation Mitigation Program. Mitigation for disturbance to 5.46 acres of riparian habitat from the County portion of the Project was provided by

expanding and enhancing existing riparian habitat and creating approximately 11.0 acres of riparian habitat in the Arroyo Seco area of Pasadena through a program of tree planting, streambank stabilization, streambed enlargement or streamzone rehabilitation in existing degraded drainage channels. As a component of the mitigation plan, new streamzone/wetland areas that meet U.S. Army Corps of Engineers criteria will also be created within the riparian systems so that there will be no net loss in wetland values or area as a result of the Project. Final site selection, detailed engineering plans, and working drawings of the Mitigation Program has been fully coordinated with the applicable regulatory agencies so that a final, adequate plan was developed based on the concepts described in the proposed mitigation plan.

MM-230 Recycled green waste will be used to amend cover soils to provide an enhanced revegetation growing medium as permitted.

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7.0 FINDINGS REGARDING THE ALTERNATIVES TO THE PROJECT IDENTIFIED IN THE FEIR AND SEIR AND SUBSEQUENTLY NOT IMPLEMENTED

Various alternatives to the proposed Project were considered and described in both the 1993 FEIR and the 1999 City SEIR. The alternatives analyzed in these documents presented two separate ranges of reasonable choices among those options available to the County and City, respectively.

Based upon the FEIR and the related administrative record in 1993, the County made specific findings concerning each of the alternatives identified in the FEIR and chose to approve the 17-million-ton County Landfill on 215 acres and further landfilling in a 42-acre bridge area if the Project Proponent obtained approvals from the City for the development of the City/County Landfill Project.

In 1999, based upon the SEIR and the related administrative record, the City approved the City/County Landfill as the proposed Project, including a 194-acre landfill footprint within the City, and it made specific findings to that effect.

Currently, the County has chosen to approve CUP No. 00-194-(5), which provides County authorization for the City/County Landfill, rather than choosing the alternative of upholding the Regional Planning Commission's denial of the CUP. The following includes an updated account of the findings for the actions taken by the County in 1993 and the City in 1999, as well as findings for the County's approval of the proposed Project:

7.1 No Project Alternative

Comparison of the Site-Specific Effects of the No Project Alternative to the Effects of the Proposed Project: The County and City found that, in this respect only, the No Project Alternative would be environmentally superior to the proposed Project.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. As considered by the County in 1993 and the City in 1999, the No Project Alternative would have reduced site-specific environmental impacts in comparison to the proposed Project. As to the site itself, impacts related to air quality, geotechnical risks, surface and groundwater, biota, noise, land use, hazards, transportation and circulation, public services, utilities, aesthetics/views, and cultural resources would have been avoided or lessened. Therefore, on a site-specific basis only, this alternative would have been environmentally superior to the proposed Project. However, in 1993, the County approved the County Landfill with a daily intake of 6,600 tons; and in 1999, the City approved the City/County Landfill, including the City-only Landfill that is authorized to receive 5,500 tons of waste per day.

2. Based upon the FEIR, the County found that under the No Project Alternative, the site would ultimately be developed in accordance with existing General Plan and zoning designations for the site, and such development would potentially impose environmental impacts similar to those generated by the Project. In 1999, the City, based upon the SEIR, found that under the No Project Alternative, the Project site in the City would retain its existing land-use designation of "Open Space" and its zoning designation of "A1-1-O;" and, under that designation, the uses would be limited to one-family dwellings, community parks, golf courses, and extensive agricultural uses. However, in December 1999, the City changed the General Plan designation of this property to "Heavy Industrial," and the Project site within

the City was rezoned M3. Therefore, the proposed Project is consistent with current land-use designations.

Comparison of the Regional Effects of the No Project Alternative to the Effects of the Proposed Project: Both the County and City found that the No Project Alternative would not be environmentally superior to the proposed Project; and the County finds that failure to approve the proposed Project would not lead to environmentally superior results.

Facts in Support of Finding: The following facts are presented in support of this finding:

1. If the County and City had chosen the No Project Alternative in 1993 or 1999, respectively, greater environmental impacts would have occurred at existing in-County landfills and out-of-County landfills, as well as at potential new landfill sites, many of which are located outside of the jurisdiction and authority of the County and City.

2. Under the 1993 and 1999 No Project Alternatives, the increased use of other landfill facilities would have created significant impacts, including increased vehicular traffic, air emissions, and noise pollution in the vicinity of those affected landfills. Likewise, if existing landfill facilities had increased their daily and weekly intake rates to accommodate additional waste demand, remaining disposal capacity would have been reduced, and disposal capacity would have been diminished. Also, if new landfill facilities had been developed, undisturbed natural areas would have been impacted, and physical effects on several resources would have occurred.

3. Under the current No Project Alternative, even if the County chose not to approve CUP No. 00-194-(5), the environmental impacts of the separate County and City Landfills, which are authorized to fill to the same horizontal and vertical limits approved for the combined landfill and would operate at 6,600 and 5,500 tons per day, respectively, would still occur. Furthermore, the ongoing operation of two working faces rather than one combined working face would result in greater environmental impacts than the proposed Project.

4. In comparison to the proposed Project, the No Project Alternative would not as completely and efficiently use the Project site that is disturbed due to years of landfilling activities, nor would it as fully use the on-site infrastructure available to accommodate landfill operations.

5. A.B. 939 mandates that both the County and City provide at least 15 years of disposal capacity. Their planning efforts have focused on mid- and long-term disposal capacity. In recognition of A.B. 939, both jurisdictions have analyzed capacity needs and have provided a full range of feasible options to address an impending shortage of local disposal capacity and diminished in-County landfill capacities. One of those options includes the development of in-County landfills, such as the proposed Project. Implementation of the current No Project Alternative would limit that option, even though such development is acknowledged as being feasible and would help resolve capacity limitations in the region.

6. The No Project Alternative would not facilitate local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for the County and City contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the County and City SRREs, CiSWMPP, the City and County Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.

7. The No Project Alternative would not fully allow enhanced cost-effective disposal options for the County, City, and private haulers at a facility within the region to minimize transportation costs.

8. The No Project Alternative would result in diminished economic revenues to the County and City in the form of tipping fees and business license taxes.

Effectiveness in Meeting Project Objectives: The No Project Alternative would not adequately implement the stated Project objectives.

Feasibility: The No Project Alternative would not be a feasible Project alternative, because the Project objectives would not be adequately met.

7.2 Smaller Landfill Alternative

7.2.1 County-Only Landfill Alternative (from FEIR only)

Comparison of the Site Specific Effects of the County-Only Landfill Alternative (No Development in the City) to those of the Proposed Project: The County found in 1993 that the County-only Landfill Alternative was environmentally superior to the proposed Project.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. This alternative would have resulted in somewhat less significant environmental impacts on a site-specific basis only, although the alternative which would have extended landfilling into the Upper Reaches of the Canyon, with an estimated net disposal capacity of 70 million tons, would have been significant.

2. In comparison to the proposed Project, this alternative would have developed a larger area in the County, but a somewhat smaller area in the entire Canyon, thereby lessening the following site-specific impacts: dust impacts due to developing a smaller piece of land; LFG emission impacts, due to a reduction of LFGs; mobile air emissions on a short-term basis once the landfill's capacity was exhausted; biological resource impacts, because a smaller area of sensitive plant communities would be removed; land use impacts, because there would be an earlier end use conversion due to the shortened site life; transportation and circulation impacts, due to a smaller volume of vehicles on-site; and cultural resource impacts, because less area that would potentially include paleontological resources would be disturbed.

3. If this alternative had been approved, it was assumed that the original City Landfill, which ceased operating in 1991, would remain inactive.

Comparison of the Regional Effects of the County-Only Landfill Alternative to the Effects of the Proposed Project: The County found that the 70-million-ton County-Only Landfill Alternative was not environmentally superior to the proposed Project.

Facts in Support of Finding: The following facts are presented in support of this finding:

1. Due to the County-Only Landfill Alternative's lesser capacity, regional environmental impacts would have been more significant than the proposed Project, because the waste

stream would have to have been transferred to other landfill facilities within or outside of the region. Significant regional impacts would have occurred, because the burden of providing additional disposal capacity would have been placed on more distant in-County or out-of-County landfill facilities.

2. In comparison to the proposed Project, the County-Only Landfill Alternative would have resulted in greater regional environmental impacts, including significant air quality impacts from mobile emissions due to greater travel distances to other landfill facilities; significant impacts upon regional transportation and circulation systems, such as railways and freeways; and increased impacts at the new and/or expanded landfill facilities, including more dust generation, biological resource impacts, and litter generation.

3. Significant public service impacts would have resulted if waste had been transported to remote landfill locations, because of the inability of these sites to provide adequate fire and paramedic emergency services.

4. Significant impacts on utilities would have resulted from underutilizing a local solid waste landfill that could potentially provide substantial solid waste disposal capacity for jurisdictions in need of that capacity; energy conservation impacts would have resulted from the increased use of fossil fuels during the mid- and long-term periods associated with increased haul distances; and significant impacts on cultural resources would have occurred at other new and/or expanded landfill facilities in the mid- and long-term periods.

5. The County-Only Landfill Alternative would not have provided as much cost-effective, mid- and long-term solid waste disposal capacity at the Project site as will the proposed Project for residences and businesses within the Los Angeles region.

6. Implementation of the County-Only Landfill Alternative instead of the proposed Project would not have provided as much efficient solid waste management and disposal capacity to the City and County to avert an identified long-term disposal capacity shortfall.

7. Implementation of the County-Only Landfill Alternative would not have as completely facilitated local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for the County and City of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the County and City SRREs, CiSWMPP, the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.

Effectiveness in Meeting Project Objectives: The County-Only Landfill Alternative would not have adequately implemented the stated Project objectives.

Feasibility: The County-Only Landfill Alternative would not have been a feasible Project alternative, because the Project objectives would not have been adequately met.

7.2.2 City-Only Landfill Alternative (from SEIR only)

Comparison of the Site Specific Effects of the City-Only Landfill Alternative to those of the Proposed Project: The City found that the City-Only Landfill Alternative, on a site-specific basis only, would have been environmentally superior to the proposed Project.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. This alternative would have resulted in less significant environmental impacts on a site-specific basis only. Approval of the City-Only Landfill Alternative would have called for the utilization of the area of the inactive City-side landfill for 5 years in order to allow enough time to seek out an alternative site or method of disposal from the Sunshine Canyon Landfill. It was assumed by the City under this alternative that the County side of Sunshine Canyon would not be developed for landfilling.

2. In comparison to the proposed Project, this alternative would have developed a smaller area, thereby minimizing the following site-specific impacts: dust, LFG emissions, mobile air emissions, biological resources, land use (because of an earlier end-use conversion), litter, transportation and circulation (smaller volume of vehicles on-site), and cultural resources.

Comparison of the Regional Effects of the City-Only Landfill Alternative to those of the Proposed Project: The City found that the City-Only Landfill Alternative was not environmentally superior to the proposed Project on a regional basis.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. Due to the City-Only Landfill Alternative's lesser capacity, regional environmental impacts would have been more significant than the proposed Project, because the waste stream would have to have been transferred to other landfill facilities within or outside of the region. For that reason, significant regional impacts would have occurred, because the burden of providing additional disposal capacity would have been placed on more distant in-County or out-of-County landfill facilities and/or potentially remote landfill locations.

2. In comparison to the proposed Project, the City-Only Landfill Alternative would have resulted in greater regional environmental impacts, including significant air quality impacts from mobile emissions due to greater travel distances to other landfill facilities; increased LFG generation at these new and/or expanded landfill facilities; increased dust generation; significant biological resource impacts at the other landfill facilities; and increased litter generation at these other facilities.

3. In addition, the City-Only Landfill Alternative would have resulted in significant impacts upon regional transportation and circulation systems, such as railways and freeways; localized impacts resulting from waste being transported to other landfill facilities; significant public service impacts due to waste transported to remote landfill locations, due to the inability of these sites to provide adequate fire and paramedic emergency services; significant impacts on utilities by underutilizing a local solid waste landfill that could have provided substantial solid waste disposal capacity for jurisdictions in need of that capacity; increased use of fossil fuels associated with increased haul distances; and significant impacts on cultural resources at other new and/or expanded landfill facilities.

4. The City-Only Landfill Alternative would not have provided as much cost-effective, mid- and long-term solid waste disposal capacity at the Project site as will the proposed Project for residences and businesses within the Los Angeles region.

5. Implementation of the City-Only Landfill Alternative would not have provided efficient solid waste management and disposal capacity to the City and County by developing an

essential landfill facility necessary to avert an identified long-term disposal capacity shortfall.

6. Implementation of the City-Only Landfill Alternative would not have facilitated local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for the City and County of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the County and City SRREs, CiSWMPP, the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.

Effectiveness in Meeting Project Objectives: The City-Only Landfill Alternative would not have adequately implemented the stated Project objectives.

Feasibility: The City-Only Landfill Alternative would not have been a feasible Project alternative, because the Project objectives would not have been adequately met.

7.2.3 Reduced Volume Alternative (from SEIR only)

Comparison of the Site Specific Effects of the Reduced Volume Alternative those of the Proposed Project: The City found that the Reduced Volume Alternative was environmentally superior to the proposed Project on a site-specific basis only.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. This alternative would have resulted in less significant environmental impacts on a site-specific basis only. Under the Reduced Volume Alternative, a landfill configuration encompassing ±60 acres would have been developed, which would have included ±44 acres in the City and ±16 acres in the County. This alternative would have provided an average waste intake of 5,000 tpd, had an estimated net disposal capacity of approximately 8.4 million tons, and resulted in an operational site life of approximately 5 years (in comparison to an expected 30-year site life for the proposed Project). The Reduced Volume Alternative would have required approximately 2.9 million cubic yards of daily, intermediate, and final cover material. The lowest elevation of excavation would have been approximately 1,525 feet MSL. Similar to the proposed Project, this alternative would have reached an elevation of 2,000 feet MSL at its top deck area. Landfill development would have avoided streambed areas of the canyon and other undisturbed areas.

2. In comparison to the proposed Projects, this alternative would have mitigated the following site-specific impacts: earth resources, dust, LFG emissions, mobile air emissions, biological resources, land use (earlier end-use conversion due to shortened site life), litter, transportation and circulation (smaller volume of vehicles on site), and cultural resources.

3. If this alternative had been approved, the County Landfill would have continued to operate independently of the Reduced Volume Alternative, which would have eventually connected with the County Landfill. As is currently the case, the City Landfill would have continued to operate independent environmental control systems (e.g. landfill liner, LCRS, LFG extraction and flaring system), separate from the County Landfill. However, ancillary uses, such as the access road, scales, and administrative offices, would have been shared. Implementation of this alternative would have required the development of a working arrangement to exercise common power over the entire Project site (i.e. ±60 acres in both

jurisdictions), as well as the joint development and mutual use of ancillary facilities within both the City and County. Such an arrangement is proposed for the Project authorized by CUP No. 00-194-(5).

Comparison of the Regional Effects of the Reduced Volume Alternative to those of the Proposed Project: The City found that the Reduced Volume Alternative was not environmentally superior to the proposed Project.

Facts in Support of Finding: The following facts were presented in support of this finding:

1. Due to the Reduced Volume Alternative's lesser capacity, regional environmental impacts would have been more significant than the proposed Project, because the waste stream would have to have been transferred to other landfill facilities within or outside of the region. Therefore, significant regional impacts would have occurred, because the burden of providing additional disposal capacity would have been placed on more distant landfill facilities.

2. In comparison to the proposed Project, the Reduced Volume Alternative would have resulted in greater regional environmental impacts, including air quality impacts from mobile emissions due to greater travel distances to other landfill facilities; increased LFG generation at these new and/or expanded landfill facilities; increased dust generation at these other facilities; biological resource impacts at these new and/or expanded landfill facilities; and increased litter generation at these other facilities.

3. In addition, the Reduced Volume Alternative would have resulted in significant impacts upon regional transportation and circulation systems, such as railways and freeways, in addition to localized impacts from waste transported to other landfill facilities; significant public service impacts, due to the inability of other sites to provide adequate fire and paramedic emergency services; significant impacts on utilities from underutilizing local solid waste landfills that could provide substantial solid waste disposal capacity for jurisdictions in need of that capacity; energy conservation impacts from the increased use of fossil fuels associated with increased haul distances; and significant impacts on cultural resources at other new and/or expanded landfill facilities.

4. Implementation of the Reduced Volume Alternative would not have reduced the Project Proponent's long-term capital outlay for site infrastructure by using existing on-site infrastructure improvements, including utilities, nor by using an improved site entrance for ingress/egress of traffic on-site, an on-site access roadway, improved scale facilities and check-in area (for weighing and accounting for waste to be deposited), surface drainage improvements, and other environmental protection and control systems.

5. The Reduced Volume Alternative would not have provided as much cost-effective waste disposal capacity at the Project site as will the proposed Project for residences and businesses within the Los Angeles region.

6. Implementation of the Reduced Volume Alternative would not have provided efficient solid waste management and disposal capacity to both the City and County by developing an essential landfill facility necessary to avert an identified long-term disposal capacity shortfall.

7. Implementation of the Reduced Volume Alternative would not have facilitated local and regional efforts directed toward the attainment of solid waste disposal capacity objectives for both the County and City of Los Angeles contained in the California Integrated Waste Management Act of 1989 (A.B. 939), the County and City SRREs, CiSWMPP, the County and City Solid Waste Management Action Plan(s), the Integrated Solid Waste Management System for Los Angeles County, and the CSE.

Effectiveness in Meeting Project Objectives: The Reduced Volume Alternative would not have adequately implemented the stated Project objectives.

Feasibility: The Reduced Volume Alternative would not have been a feasible Project alternative, because the Project objectives would not have been adequately met.

7.3 The Current No Project Alternative: Not Approving CUP No. 00-194-(5)

Comparison of the Effects of the City/County Landfill Project Authorized by CUP No. 00-194-(5) to the Effects of the No Project Alternative (Maintaining Separate County and City Landfill Operations): The County finds that the combined City/County Landfill Project is environmentally superior to continuing the operation of the two separate County and City Landfills under a No Project Alternative.

Facts in Support of Finding: The following facts are presented in support of this finding:

1. Unlike the Current No Project Alternative, which would result in the continuation of separate landfill operations, the City/County Landfill Project would result in landfilling operations within one landfill footprint located in Sunshine Canyon. As with the City/County Landfill, the separate landfills would have a total landfill footprint encompassing ±451 acres, and they would be allowed to reach the same vertical contours. However, because it would be more difficult to connect two separate landfills rather than developing one combined landfill, this alternative might not provide as much net disposal capacity as the proposed Project. Additionally, though a maximum of 12,100 tpd and an average of 11,000 tpd of waste could be received under either scenario, the site life of the proposed Project would be limited to 30 years, while there are no express limits on the separate County and City operations.

2. In contrast to the Current No Project Alternative, less significant impacts would occur under the proposed Project, because landfilling operations would be contained at a single working face area. Less daily fugitive dust emissions and air emissions from heavy equipment would be generated, because landfilling operations would be contained at one working face area instead of two separate working faces. Additionally, during high-wind episodes (i.e., Santa Ana wind conditions), landfilling operations would be conducted at wind-protected areas of the site within either jurisdiction, and off-site fugitive dust emissions would be reduced due to the flexible location of landfilling operations. Furthermore, the landfilling operations would result in less significant litter generation, because landfilling would be confined to wind-protected areas of the Project site during high-wind conditions, and off-site windblown litter would be reduced due to the flexible location of the active working face area.

3. In contrast to the Current No Project Alternative, reduced worker safety impacts would result due to the consolidation of heavy equipment and the increased ability to control the routing of waste-hauling vehicles ingressing and egressing the Project site. This would result in less on-site vehicular congestion, facilitate safer turning movements, and increase driver

visibility. The Project would provide easier access to both County and City Fire Departments, as well as to other emergency personnel due to reduced on-site vehicle congestion as a result of confining landfilling operations to one working face. The use of a single working face area would result in the need for less water consumption for dust control purposes.

4. The Current No Project Alternative would result in site-specific and regional impacts that are greater than those of the proposed Project. Therefore, the proposed Project would be environmentally superior to the Current No Project Alternative.

5. Additionally, the development of the proposed Project would reduce the long-term capital outlay necessary for infrastructure improvements. By reducing the long-term capital costs for the Project, the Project Proponent would be able to provide more cost-effective tipping fees for the County, the City, and private haulers.

6. Unlike the Current No Project Alternative, the proposed Project would meet all stated development and solid waste objectives of the County and City. Implementation of the Project would facilitate the waste planning efforts of both the County and City necessary to meet their short-, mid-, and long-term planning needs.

Effectiveness in Meeting Project Objectives: The Current No Project Alternative would not adequately implement the stated Project objectives.

Feasibility: The Current No Project Alternative would be a feasible Project alternative, however, the stated Project objectives would not be adequately met.

7.4 Environmentally Superior Alternative

The County finds that the proposed Project, the City/County Landfill, is environmentally superior to all remaining alternatives.

Facts in Support of Finding: The following facts are presented in support of this finding:

1. Though environmentally superior on a site-specific basis, the No Project Alternatives originally considered by the County and City, respectively, are now moot, since the County approved the County Landfill in 1993, with an intake rate of 6,600 tons per day, and in 1999, the City approved the City Landfill, with a daily intake rate of 5,500 tons. The County and City Landfills together have a maximum daily intake rate of 12,100 tons; and their respective footprints total ±451 acres, equal to that of the proposed joint landfill Project; and they would be allowed to reach the same vertical contours as the proposed Project.

2. As discussed above, the Current No Project Alternative, which would call for the continued operation of the separate County and City Landfills, is not environmentally superior to the proposed Project on either a site-specific or regional basis.

3. In any event, even if the Current No Project Alternative were deemed environmentally superior, State CEQA Guidelines, § 15126, subd. (d)(4) provides: "If the environmentally superior alternative is the 'no project' alternative, the [agency] shall also identify an environmentally superior alternative among the other alternatives." In this regard, the environmentally superior alternative is the proposed Project: the City/County Landfill.

Effectiveness in Meeting Project Objectives: As the proposed Project, the City/County Landfill would meet all of the Project objectives.

Feasibility: The proposed Project would be feasible, as it would meet all of the Project objectives.

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8.0 FINDINGS REGARDING THE MITIGATION MONITORING AND REPORTING SUMMARY

Section 21081.6 of the Public Resources Code requires a public agency making findings to adopt a reporting or monitoring program for the changes to the project that it has adopted or to make a condition of project approval in order to mitigate or avoid significant effects on the environment. The County hereby finds that the Mitigation Reporting and Monitoring Summary Program (MMRS), as adopted by the County for the proposed Project, meets the requirements of Section 21081.6 of the Public Resources Code.

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9.0 FINDINGS REGARDING THE STATEMENT OF OVERRIDING CONSIDERATIONS

This section of the findings addresses the requirement in Section 15093 of the State CEQA Guidelines that the County, in its role as Lead Agency under CEQA, balance the benefits of the Project against its unavoidable significant impacts to determine whether the impacts are acceptably overridden by the Project's anticipated benefits. If the benefits are determined to outweigh the unavoidable significant impacts, the County can deem such impacts "overriden" and approve the Project with a Statement of Overriding Considerations that documents the reasons for Project approval, based upon the administrative record.

The FEIR, SEIR, and Addendum have identified and discussed the significant effects that could occur as a result of proposed Project development. With the implementation of the mitigation measures discussed in the FEIR, SEIR, and Addendum, these effects can be mitigated to a less than significant level, except for unavoidable significant impacts on air quality and biota, as identified in Section 6.0 of this document.

Based upon the administrative record, the County finds that the benefits of the proposed Project outweigh these potential unavoidable impacts, since the Project will:

1. Connect the two separate City and County Landfills into a single landfill footprint with landfilling operations at a single disposal area in either jurisdiction, thereby lessening environmental impacts by providing: (1) one working face, which will generate fewer air quality impacts; (2) one point of ingress/egress for disposal vehicles, which will create a more efficient traffic pattern; (3) consolidated scale facilities/check-in area, which will eliminate redundant operations of two facilities; and (4) enhanced surface drainage improvements and other environmental protection and control systems.

2. Provide a state-of-the-art landfill that meets or exceeds all local, state and federal regulations for environmentally sound solid waste disposal, the water and air quality protection, and seismic safety assurance.

3. Minimize impacts on regional air quality by providing additional disposal capacity within the Los Angeles region, thereby reducing vehicle emissions from transporting refuse longer distances.

4. Defer the significant impacts on environmental resources that would result from the development of new landfill sites located within undisturbed canyon areas or remote desert locations.

5. Allowing a number of these facilities to close in compliance with their permitted closure plans, thereby avoiding the potential adverse effects associated with using existing landfills beyond their design capacities.

6. Utilize land that is already significantly disturbed due to extensive landfilling operations.

7. Keep waste disposal costs low by enhancing the use of an established, regional waste disposal facility in close proximity to waste sources, and by utilizing existing on-site infrastructure.

8. Maximize the County's revenues by fully utilizing already-approved, available capacity and providing the County over the life of the permit with more than $60 million dollars from fees imposed by the new CUP conditions of approval over the life of the joint landfill.

9. Provide efficient solid waste management and disposal capacity by operating a regional landfill facility to avert both short-term and long-term solid waste disposal capacity shortfalls within the County. In this regard, potential short-term and long-term alternatives to the Project would not be

environmentally superior, nor would they allow the County to adequately satisfy its waste disposal needs, as described in detail in the FEIR and Addendum.

10. As a major Class III landfill site and a significant component of the County's regional integrated waste management system for up to the next 30 years, comply with comprehensive, long-term plans of the County, including the County Integrated Solid Waste Management System, the County Countywide Siting Element, the County Source Reduction and Recycling Element, and formally executed agreements between the County and the City that identify the need for the maximum technically and environmentally feasible expansion of landfill sites.

11. Fulfill its designation as both a Class III landfill site in the County Solid Waste Management Plan (Revision A) and a major planned extension of an existing landfill facility in the County Solid Waste Management Action Plan.

12. Facilitate local and regional efforts directed toward attaining solid waste disposal capacity objectives for the County contained in the California Integrated Waste Management Act of 1989 (AB 939).

13. Provide opportunities to continue to implement various waste diversion, recovery and recycling measures to contribute to the County's efforts to comply with the requirements of AB 939, such as on-site recycling of beverage containers, cardboard, used oil construction demolition and green/wood waste.

14. Comply with the State of California mandated requirements of AB 939 to provide a minimum of 15 years of solid waste disposal capacity.

15. Provide the County pursuant to a proposed revenue-sharing agreement with the City of Los Angeles, with a specified portion of all tipping fees collected at the joint landfill by the landfill operation during the anticipated 30-year life of the facility, whether solid waste is disposed of in the City or County area of the facility.

16. Generate 75 new full-time jobs within Los Angeles County at the Project site and provide short-term construction jobs during each sequence of landfill.

The foregoing benefits provided to the public through approval of and implementation of the Project outweigh the identified significant environmental effects of the Project which cannot be mitigated.